

# **Exhibit 5**

KEVIN WALSH 2/9/2017

Page 1	Page 3
<p>1 UNITED STATES DISTRICT COURT 2 EASTERN DISTRICT OF MISSOURI 3 EASTERN DIVISION 4 --oOo-- 5 DWAYNE FURLOW, et al., ) 6 Plaintiff ) 7 vs. )Case No. 8 JON BELMAR, et al., )4:16-cv-00254-CEJ 9 Defendants. ) 10 _____ ) 11 VIDEO-RECORDED DEPOSITION OF 12 KEVIN WALSH 13 _____ 14 February 9, 2017 15 16 (Beginning at 9:31 a m.) 17 18 19 20 21 22 23 24 25</p>	<p>1 Exhibit A Document entitled "St. Louis 148 2 County CAD Call Search 3 Application" 4 (The original exhibits were retained by the court 5 reporter and will be copied and attached to copies 6 of the transcript.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
Page 2	Page 4
<p>1 2 INDEX 3 PAGE 4 5 EXAMINATION BY MR. HAMILTON .....8 6 EXAMINATION BY MR. HUGHES .....143 7 FURTHER EXAMINATION BY MR. HAMILTON .....173 8 9 10 EXHIBITS 11 Exhibit 1 Document on REJIS letterhead 62 12 entitled "Wanted Entry" Bates 13 stamped DEFRFP40000001 14 Exhibit 2 Document on REJIS letterhead 62 15 entitled "Law Enforcement Wanted 16 Entry" Bates stamped 17 DEF-SUPP0000022 18 Exhibit 3 Department General Order 11-26 101 19 Bates stamped DEFRFP2340000013 20 Exhibit 4 Department General Order 15-26 104 21 Bates stamped DEFRFP234000017 22 Exhibit 5 Department General Order 16-26 110 23 Bates DEFRFP234000022 24 Exhibit 6 Police report Bates stamped 115 25 DEFRFP1000014</p>	<p>1 UNITED STATES DISTRICT COURT 2 EASTERN DISTRICT OF MISSOURI 3 EASTERN DIVISION 4 --oOo-- 5 DWAYNE FURLOW, et al , ) 6 ) 7 ) 8 Plaintiff ) 9 ) 10 vs )Case No 11 JON BELMAR, et al , )4:16-cv-00254-CEJ 12 ) 13 Defendants ) 14 _____ ) 15 16 --oOo-- 17 VIDEO-RECORDED DEPOSITION OF KEVIN WALSH, 18 produced, sworn, and examined on Thursday, February 19 9, 2017, taken on behalf of the Plaintiffs, at the 20 offices of Midwest Litigation Services, 711 North 21 11th Street, in the City of St. Louis, State of 22 Missouri, before RENÉE COMBS QUINBY, a Certified 23 Court Reporter (MO), Certified Shorthand Reporter 24 (CA), Registered Merit Reporter, Certified Realtime 25 Reporter, and a Notary Public within and for the State of Missouri</p>

1 (Pages 1 to 4)

KEVIN WALSH 2/9/2017

Page 5	Page 7
<p>1 2 3 APPEARANCES 4 5 FOR THE PLAINTIFFS: 6 Blake Strode, Esq. 7 ArchCity Defenders, Inc. 8 1210 Locust Street 9 St. Louis, MO 63103 10 (855)724-2489 11 bstrode@archcitydefenders.org 12 13 Timothy Holland, Esq. 14 Elizabeth Grossman, Esq. 15 Jonathan Wall, Esq. 16 Charles Hamilton, Esq. 17 Paul, Weiss, Rifkind, Wharton &amp; Garrison LLP 18 1285 Avenue of the Americas 19 New York, NY 10019-6064 20 (212)373-3373 21 tholland@paulweiss.com 22 egrossman@paulweiss.com 23 jwall@paulweiss.com 24 chamilton@paulweiss.com 25</p>	<p>1 --oOo-- 2 IT IS HEREBY STIPULATED AND AGREED by and 3 between counsel for the Plaintiffs and counsel for 4 the Defendants, that this deposition may be taken in 5 machine shorthand by RENÉE COMBS QUINBY, a Certified 6 Court Reporter and Notary Public, and afterwards 7 transcribed into typewriting, and the signature 8 waived by agreement of Counsel and consent of the 9 Witness. 10 --oOo-- 11 PROCEEDINGS 9:31 a.m. 12 --oOo-- 13 THE VIDEOGRAPHER: We are now on the 14 record. Today's date is February the 9th, 2017. 15 The time is approximately 9:32 a.m. 16 This is the video-recorded deposition 17 of Kevin Walsh, in the matter of Furlow, et al. 18 versus Belmar, et al., Case Number 4:16CV00245CEJ in 19 the United States District Court for the Eastern 20 District of Missouri. 21 This deposition is being held at 22 Midwest Litigation Services in St. Louis, Missouri. 23 The reporter's name is Renée Quinby. My name is 24 David Doell, and I'm the legal videographer. We're 25 here with Midwest Litigation Services.</p>
Page 6	Page 8
<p>1 FOR THE DEFENDANTS: 2 Michael E. Hughes, Esq. 3 St. Louis County Counselor's Office 4 41 S. Central Avenue, 9th Floor 5 Clayton, MO 63105 6 (314)615-7042 7 mhughes2@stlouisco.com 8 9 THE VIDEOGRAPHER: 10 David Doell 11 Midwest Litigation Services 12 711 North 11th Street 13 St. Louis, MO 63101 14 (314)644-2191 15 16 COURT REPORTER: 17 RENÉE COMBS QUINBY, RMR, CRR 18 CSR (CA) #11867 19 CCR (MO) #1291 20 Midwest Litigation Services 21 711 North 11th Street 22 St. Louis, MO 63101 23 (314)644-2191 24 25</p>	<p>1 Will the attorneys present please 2 introduce yourselves. 3 MR. HAMILTON: My name is Charles 4 Hamilton from Paul, Weiss. I'm joined with my 5 colleague Jonathan Wall, Elizabeth Grossman and Tim 6 Holland. I'm also joined by cocounsel who I'll have 7 introduce himself. 8 MR. STRODE: Blake Strode with ArchCity 9 Defenders, also for the plaintiffs. 10 MR. HUGHES: Oh, I'm Michael Hughes, 11 sorry. I represent Kevin Walsh. I also represent 12 Laura Clements and Chris Partin and Chief Belmar in 13 his official capacity, and St. Louis County, 14 Missouri. 15 THE VIDEOGRAPHER: If the court 16 reporter would please swear in the witness, we may 17 proceed. 18 KEVIN WALSH, 19 of lawful age, having been first duly sworn to 20 testify to the truth, the whole truth, and nothing 21 but the truth in the case aforesaid, deposes and 22 says in reply to oral interrogatories propounded as 23 follows, to-wit: 24 --oOo-- 25 EXAMINATION</p>

2 (Pages 5 to 8)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 9	Page 11
<p>1 BY MR. HAMILTON:</p> <p>2 Q. Good morning, Officer Walsh.</p> <p>3 A. Good morning.</p> <p>4 Q. My name is Charles Hamilton, and I'll</p> <p>5 be asking you some questions today. I'm one of the</p> <p>6 attorneys representing the plaintiffs in this</p> <p>7 action, including Dwayne Furlow, Howard Liner, and</p> <p>8 Ralph Torres.</p> <p>9 When I ask you questions today, if for</p> <p>10 any reason you think that my question is vague or</p> <p>11 confusing, please tell me and I'll rephrase it. And</p> <p>12 otherwise, I'll assume you've heard and understood</p> <p>13 the question. Is that all right?</p> <p>14 A. Yes.</p> <p>15 Q. Is there any reason such as a medical</p> <p>16 condition or the influence of any substance that it</p> <p>17 would affect your ability to testify fully and</p> <p>18 truthfully today?</p> <p>19 A. No.</p> <p>20 Q. Will you tell me if that changes at all</p> <p>21 over the course of our deposition?</p> <p>22 A. Yes.</p> <p>23 Q. For the sake of efficiency and to get</p> <p>24 you out of here and get all of us out of here as</p> <p>25 quickly as possible, there are a couple of ground</p>	<p>1 go back to that and you can complete your testimony;</p> <p>2 is that all right?</p> <p>3 A. Yes.</p> <p>4 Q. Third, we can take a break at your</p> <p>5 leisure. Hopefully this room won't get too hot.</p> <p>6 But if at any point you need to use the restroom or</p> <p>7 just need a break, please let me know. The only</p> <p>8 question I ask -- or the only request I have is that</p> <p>9 if we're in the middle of a question, if you'll just</p> <p>10 let us complete that question before you request a</p> <p>11 break; is that all right?</p> <p>12 A. Yes.</p> <p>13 Q. Lastly, are you represented by</p> <p>14 Mr. Hughes today?</p> <p>15 A. Yes.</p> <p>16 Q. At particular times he may object to a</p> <p>17 line of questioning that I ask. If he does, unless</p> <p>18 he instructs you not to answer, you may proceed to</p> <p>19 answer the question. The objection is for the</p> <p>20 purposes of the record. Do you understand?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand that I'm going to ask</p> <p>23 you questions today in connection with a legal case?</p> <p>24 A. Yes.</p> <p>25 Q. And do you understand that you are</p>
Page 10	Page 12
<p>1 rules that I'm going to cover, and I apologize if</p> <p>2 they're duplicative. You've been deposed before.</p> <p>3 I'm just going to run through them pretty quickly.</p> <p>4 First, as you can see, we do have a</p> <p>5 court reporter here with us today trying to take</p> <p>6 down everything that we say. She's only one person.</p> <p>7 We are a couple. And if you include Mr. Hughes,</p> <p>8 that's three of us. If all of us are talking at the</p> <p>9 same time, basically makes it impossible for her to</p> <p>10 capture and attribute the correct statements to the</p> <p>11 correct people. So it's going to be a little bit</p> <p>12 weird, but I'm going to do my best to not talk over</p> <p>13 you, if you'll do the same for me. Is that all</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. Second, as you were just told by the</p> <p>17 court reporter, you are on the record and under</p> <p>18 oath. So it's important that you provide accurate</p> <p>19 and truthful testimony and in as complete a manner</p> <p>20 as you possibly can.</p> <p>21 If at any point in time over the course</p> <p>22 of the deposition, even if a line of questioning has</p> <p>23 passed, you realize that there's something you</p> <p>24 forgot or something that you wanted to complete, you</p> <p>25 can always feel free to alert me of that and we can</p>	<p>1 defendant -- a defendant in that legal case?</p> <p>2 A. Yes.</p> <p>3 Q. What is your understanding of the legal</p> <p>4 case?</p> <p>5 A. Challenging the wanted system.</p> <p>6 Q. And have you read the complaint or any</p> <p>7 of the materials that have been filed in court?</p> <p>8 A. Yes.</p> <p>9 Q. What materials have you read?</p> <p>10 A. The complaint.</p> <p>11 Q. Anything else?</p> <p>12 A. I believe the interrogatory.</p> <p>13 Q. Okay. Anything else?</p> <p>14 A. (Shakes head.)</p> <p>15 Q. Have you ever been deposed before?</p> <p>16 A. No.</p> <p>17 Q. Okay. Officer Walsh -- and just to</p> <p>18 confirm, is it all right if I refer to you as</p> <p>19 Officer Walsh? Is there --</p> <p>20 A. Yes.</p> <p>21 Q. -- a better designation?</p> <p>22 Thank you.</p> <p>23 How did you learn that you were being</p> <p>24 asked to testify in this matter?</p> <p>25 A. I was contacted by Mr. Hughes.</p>

3 (Pages 9 to 12)

KEVIN WALSH 2/9/2017

Page 13	Page 15
<p>1 Q. And how did -- what did you do, if</p> <p>2 anything, to prepare for today's deposition?</p> <p>3 A. Read the reports that -- my contact</p> <p>4 with Mr. Furlow and the complaint.</p> <p>5 Q. Okay. Did you meet with your attorney?</p> <p>6 A. I did.</p> <p>7 Q. About how many times did you meet with</p> <p>8 Mr. Hughes?</p> <p>9 A. Roughly three.</p> <p>10 Q. About when?</p> <p>11 MR. HUGHES: In -- in preparation for</p> <p>12 the deposition is what he asked.</p> <p>13 THE WITNESS: Just one then.</p> <p>14 BY MR. HAMILTON:</p> <p>15 Q. Just one.</p> <p>16 About when was that time that you met</p> <p>17 with Mr. Hughes to discuss this case?</p> <p>18 A. Last week.</p> <p>19 Q. And in addition to the documents that</p> <p>20 we've already mentioned, did you review any</p> <p>21 documents during these -- during this meeting?</p> <p>22 A. Could you -- could you re- --</p> <p>23 Q. I apologize.</p> <p>24 A. -- clarify?</p> <p>25 Q. Did you review any documents outside of</p>	<p>1 Q. So is it fair to say it's word of mouth</p> <p>2 over email? Is there anything else?</p> <p>3 A. No.</p> <p>4 Q. Okay. Did someone collect documents or</p> <p>5 files from you related to this litigation?</p> <p>6 A. No.</p> <p>7 Q. So just to be clear, the records that</p> <p>8 you reviewed with Mr. Hughes and the CAD report,</p> <p>9 these were documents that -- that you did not</p> <p>10 provide. They were housed on some other system; is</p> <p>11 that correct?</p> <p>12 A. Could you clarify?</p> <p>13 Q. Sure.</p> <p>14 That the documents that you referred to</p> <p>15 in terms of what you reviewed for today's</p> <p>16 deposition, none of those were ones that you</p> <p>17 personally collected from your email or any other</p> <p>18 database?</p> <p>19 A. No.</p> <p>20 Q. Okay. Are you familiar with Detective</p> <p>21 Laura Clements?</p> <p>22 A. No.</p> <p>23 Q. Are you familiar with Officer</p> <p>24 Christopher Partin?</p> <p>25 A. No.</p>
Page 14	Page 16
<p>1 the complaint, the interrogatories, and the</p> <p>2 underlying reports?</p> <p>3 A. Just our CAD system. Calls for</p> <p>4 service.</p> <p>5 Q. Is -- what does CAD stand for?</p> <p>6 A. Computer-automated, I believe,</p> <p>7 dispatching.</p> <p>8 Q. And just briefly, could you describe</p> <p>9 what a -- what a CAD report is?</p> <p>10 A. It shows calls for service to a -- a</p> <p>11 residence.</p> <p>12 Q. Okay. Do you have a work-related email</p> <p>13 address, Officer Walsh?</p> <p>14 A. Yes.</p> <p>15 Q. Have you communicated with others</p> <p>16 within your police department about this case over</p> <p>17 that email address?</p> <p>18 A. No.</p> <p>19 Q. Have you communicated with others in</p> <p>20 your department about this case in general?</p> <p>21 A. No.</p> <p>22 Q. And what other means of communication</p> <p>23 do you typically use to communicate work-related</p> <p>24 matters?</p> <p>25 A. Word of mouth.</p>	<p>1 Q. Are you familiar with Chief Jon Belmar?</p> <p>2 A. Yes.</p> <p>3 Q. How do you know Chief Jon Belmar?</p> <p>4 A. He's the Chief of Police of the</p> <p>5 department that I work for.</p> <p>6 Q. Have you worked at all with him</p> <p>7 directly?</p> <p>8 A. No.</p> <p>9 Q. Have you spoken with him outside</p> <p>10 of -- strike that.</p> <p>11 Have you ever spoken directly to him</p> <p>12 face-to-face, one-on-one?</p> <p>13 A. Yes.</p> <p>14 Q. What were the occasions for you to have</p> <p>15 those one-on-one conversations?</p> <p>16 A. It was the end of probation period,</p> <p>17 meeting with the chief to discuss my year, and I</p> <p>18 think just other random events that St. Louis County</p> <p>19 puts on.</p> <p>20 Q. What types of events were those?</p> <p>21 A. Christmas party or things of that</p> <p>22 nature.</p> <p>23 Q. Are these type -- the types of</p> <p>24 conversations that Chief Belmar has with other sort</p> <p>25 of probationary officers?</p>

4 (Pages 13 to 16)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 17</p> <p>1 A. Yes.</p> <p>2 <b>Q. Okay. Would you describe it as like a</b></p> <p>3 <b>check-in?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. Is this the type of conversation that</b></p> <p>6 <b>happens annually?</b></p> <p>7 A. No.</p> <p>8 <b>Q. And during that conversation, did you</b></p> <p>9 <b>discuss your performance at all?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. What aspects of your performance did</b></p> <p>12 <b>you two discuss?</b></p> <p>13 A. My demeanor in the -- in the police</p> <p>14 department, how he believed that I was perceived by</p> <p>15 other officers, supervisors, and then just general</p> <p>16 things that maybe the department could do to -- to</p> <p>17 grow.</p> <p>18 <b>Q. Was this -- was this conversation --</b></p> <p>19 <b>did you perceive this conversation to be an</b></p> <p>20 <b>evaluation of any sort?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Do you know if it was recorded in any</b></p> <p>23 <b>file or documentation?</b></p> <p>24 A. I'm unaware.</p> <p>25 <b>Q. Do you recall whether Chief Belmar was</b></p>	<p style="text-align: right;">Page 19</p> <p>1 <b>Q. And so you chose to participate?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Officer Walsh, do you know Dwayne</b></p> <p>4 <b>Furlow?</b></p> <p>5 A. I do.</p> <p>6 <b>Q. How do you know Mr. Furlow?</b></p> <p>7 A. Calls for service to his residence.</p> <p>8 <b>Q. About how many times have you received</b></p> <p>9 <b>calls for service to his residence?</b></p> <p>10 A. Roughly five, six.</p> <p>11 <b>Q. Have you had any communications with</b></p> <p>12 <b>Mr. Furlow since this case was filed in February,</b></p> <p>13 <b>2016?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. What would have been the nature of</b></p> <p>16 <b>those encounters?</b></p> <p>17 A. It was calls for service to his</p> <p>18 residence for destruction of properties, I believe</p> <p>19 disturbances, and keep the peace with Division of</p> <p>20 Family Services.</p> <p>21 <b>Q. Do you know either of the other named</b></p> <p>22 <b>defendants in this matter, Ralph Torres or Harold</b></p> <p>23 <b>Liner?</b></p> <p>24 A. No.</p> <p>25 <b>Q. What was your reaction --</b></p>
<p style="text-align: right;">Page 18</p> <p>1 <b>taking notes during that conversation?</b></p> <p>2 A. I don't believe he was.</p> <p>3 <b>Q. Where did you have that conversation?</b></p> <p>4 A. His office.</p> <p>5 <b>Q. And have you had occasion to meet or</b></p> <p>6 <b>talk with Chief Jon Belmar outside of the St. Louis</b></p> <p>7 <b>County Police Department offices?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. What occasions have those been?</b></p> <p>10 A. The functions of Christmas parties or a</p> <p>11 BackStopper event, things of that nature.</p> <p>12 <b>Q. What is a BackStopper event?</b></p> <p>13 A. It's a local charity organization that</p> <p>14 supports law enforcement and first responders.</p> <p>15 <b>Q. And what type of activities or events</b></p> <p>16 <b>do they hold?</b></p> <p>17 A. Boxing matches, car shows, other</p> <p>18 assortment of -- of charity functions that -- I</p> <p>19 could probably go on and on.</p> <p>20 <b>Q. And how did you get -- or strike that.</b></p> <p>21 <b>Are all officers involved in these</b></p> <p>22 <b>types of events?</b></p> <p>23 A. They can be if they want. It's up to</p> <p>24 their discretion if they choose to -- to</p> <p>25 participate.</p>	<p style="text-align: right;">Page 20</p> <p>1 MR. HUGHES: Excuse me. Maybe I heard</p> <p>2 you wrong, but I thought you said, Do you know the</p> <p>3 other defendants, Mr. Liner, but you meant the</p> <p>4 plaintiffs; is that right?</p> <p>5 MR. HAMILTON: I apologize.</p> <p>6 MR. HUGHES: If I heard it wrong --</p> <p>7 MR. HAMILTON: No. You've got --</p> <p>8 you've got that correct.</p> <p>9 MR. HUGHES: -- but maybe I did.</p> <p>10 MR. HAMILTON: Thank you. Thank you,</p> <p>11 Mr. Hughes. That's correct.</p> <p>12 <b>Q. The other plaintiffs, Ralph Torres or</b></p> <p>13 <b>Harold Liner, do you know either of them?</b></p> <p>14 A. No.</p> <p>15 <b>Q. Thank you.</b></p> <p>16 <b>Officer Walsh, what was your reaction</b></p> <p>17 <b>upon learning that you were named as a defendant in</b></p> <p>18 <b>this matter?</b></p> <p>19 A. Confused.</p> <p>20 <b>Q. Why?</b></p> <p>21 A. Never been sued before.</p> <p>22 <b>Q. That's fair.</b></p> <p>23 <b>Okay. So let's walk through some of</b></p> <p>24 <b>your professional background, starting with</b></p> <p>25 <b>education.</b></p>

5 (Pages 17 to 20)

KEVIN WALSH 2/9/2017

Page 21	Page 23
<p>1           <b>Officer Walsh, have you ever been known</b></p> <p>2 <b>by another name?</b></p> <p>3           A. No.</p> <p>4           <b>Q. Okay. Could you state your educational</b></p> <p>5 <b>background going in reverse from -- not in reverse</b></p> <p>6 <b>but let's start at the end of high school and coming</b></p> <p>7 <b>up to the most recent education that you've</b></p> <p>8 <b>received.</b></p> <p>9           A. High school diploma, bachelor's degree,</p> <p>10 and then a graduate of the St. Louis County Police</p> <p>11 Academy.</p> <p>12           <b>Q. Can you go back through each of those</b></p> <p>13 <b>and -- and tell me -- tell us where you received</b></p> <p>14 <b>each of those educational experiences?</b></p> <p>15           A. In 2005 it was Christian Brothers</p> <p>16 College High School.</p> <p>17           And in 2010, it was Harris-Stowe State</p> <p>18 University.</p> <p>19           <b>Q. What was your major?</b></p> <p>20           A. Criminal justice.</p> <p>21           <b>Q. Did you know at that point that you</b></p> <p>22 <b>wanted to be a police officer?</b></p> <p>23           A. No.</p> <p>24           <b>Q. What did you do after graduating from</b></p> <p>25 <b>college?</b></p>	<p>1 offender may have occurred while on probation or</p> <p>2 parole.</p> <p>3           <b>Q. And where were you based during this</b></p> <p>4 <b>time?</b></p> <p>5           A. Downtown St. Louis.</p> <p>6           <b>Q. And what was your -- do you have a</b></p> <p>7 <b>jurisdiction in that job, like a --</b></p> <p>8           A. Yes. It was primarily everything from</p> <p>9 the Wainwright Building north up until the 63147 ZIP</p> <p>10 code which is right about the county/city line.</p> <p>11           <b>Q. Okay. So I'm not from here, so give me</b></p> <p>12 <b>a sense of how long would it take to drive from the</b></p> <p>13 <b>farthest two points of that jurisdiction, just to</b></p> <p>14 <b>get a sense of how big that is.</b></p> <p>15           A. Roughly 20 minutes.</p> <p>16           <b>Q. Okay. Okay.</b></p> <p>17           MR. HUGHES: Just so you know, in</p> <p>18 St. Louis, everything is about 20 minutes away.</p> <p>19 Sometimes 30.</p> <p>20           MR. HAMILTON: Starting to gather that.</p> <p>21 Of course with no traffic.</p> <p>22           <b>Q. And how long did you hold this</b></p> <p>23 <b>position?</b></p> <p>24           A. I was an intern for six months, and</p> <p>25 then I worked there, I believe, about a year and a</p>
Page 22	Page 24
<p>1           A. I became a probation parole officer for</p> <p>2 the State of Missouri.</p> <p>3           <b>Q. Tell me about that experience. How did</b></p> <p>4 <b>you come to apply for that job?</b></p> <p>5           A. It was something that I was interested</p> <p>6 in. I met the requirements, took their exam,</p> <p>7 passed, and graduated the Missouri Department of</p> <p>8 Corrections along the lines of a -- of Academy. I</p> <p>9 don't know the correct term for it.</p> <p>10           <b>Q. When you say you "met the</b></p> <p>11 <b>requirements," what were those requirements?</b></p> <p>12           A. They were looking for college --</p> <p>13 college degrees. Off the top of my head, I -- I</p> <p>14 wouldn't be able to give you much more than that.</p> <p>15 I'm sorry.</p> <p>16           <b>Q. Sure.</b></p> <p>17           <b>And what did your -- what did that job</b></p> <p>18 <b>entail?</b></p> <p>19           A. It was to monitor, investigate</p> <p>20 felony -- offenders that were on Missouri probation</p> <p>21 and/or parole for felony crimes, to investigate</p> <p>22 their family as a suitable home for this person to</p> <p>23 live. It was to institute drug treatment if need --</p> <p>24 if needed, and it was also to investigate possible</p> <p>25 employment and any other violations that the</p>	<p>1 half.</p> <p>2           <b>Q. Okay. Were there significant changes</b></p> <p>3 <b>in responsibilities as an intern and as a full-time</b></p> <p>4 <b>probation officer?</b></p> <p>5           A. No.</p> <p>6           <b>Q. Okay. And at some point that</b></p> <p>7 <b>employment ended. What did you do after that?</b></p> <p>8           A. I enrolled into the St. Louis County</p> <p>9 Police Academy.</p> <p>10           <b>Q. And so was it during your time as a</b></p> <p>11 <b>probationary officer -- or a probation officer,</b></p> <p>12 <b>excuse me, that you realized you wanted to join the</b></p> <p>13 <b>police force?</b></p> <p>14           A. Yes.</p> <p>15           <b>Q. And so help me chronologically. About</b></p> <p>16 <b>what year was it that you decided to -- to join the</b></p> <p>17 <b>St. Louis County police force?</b></p> <p>18           A. It would have been 2012.</p> <p>19           <b>Q. Okay. And so what -- what was that</b></p> <p>20 <b>process like? You -- presumably you applied?</b></p> <p>21           A. Yes.</p> <p>22           <b>Q. And how long -- what was the</b></p> <p>23 <b>application process?</b></p> <p>24           A. It was a written application. After</p> <p>25 that there were written tests, verbal tests, a</p>

6 (Pages 21 to 24)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

Page 25	Page 27
<p>1 physical fitness test, background investigation, 2 polygraph test, and ultimately a board panel 3 interview with the higher ranking St. Louis County 4 police officers. 5 <b>Q. How did that compare to the -- to the</b> 6 <b>application process for serving as a probation</b> 7 <b>officer?</b> 8 A. Night and day. 9 <b>Q. Night and day?</b> 10 A. Yes. 11 <b>Q. Much more comprehensive?</b> 12 A. Yes. 13 <b>Q. And then so how long did it take from</b> 14 <b>applying to become a police officer to learning that</b> 15 <b>you'd been accepted to the Academy?</b> 16 A. I'd say roughly six months. 17 <b>Q. Okay. At which point you began -- did</b> 18 <b>you immediately start the St. Louis -- strike that.</b> 19 <b>At that point did you immediately begin</b> 20 <b>enrollment in the Police Academy?</b> 21 A. Yes. 22 <b>Q. And so now what year was that?</b> 23 A. 2013. 24 <b>Q. Okay. Do you remember the month?</b> 25 A. It would have been June.</p>	<p>1 A. Yes. 2 <b>Q. So at that point, what was your -- what</b> 3 <b>was your position or title with the St. Louis County</b> 4 <b>police force?</b> 5 A. Probationary police officer. 6 <b>Q. And how long were you a probationary</b> 7 <b>police officer?</b> 8 A. One year. 9 <b>Q. Is that standard?</b> 10 A. Yes. 11 <b>Q. And what does it mean to be a</b> 12 <b>probationary police officer?</b> 13 A. It pretty much means you don't have the 14 protections outside of the police department with 15 the Police Officers's Association necessarily, and 16 that you have to meet a certain criteria to get off 17 probation that the police department sets up. 18 <b>Q. Do you know what that -- what that</b> 19 <b>criteria is?</b> 20 A. Successful completion of field 21 training. 22 <b>Q. Okay. So what is field training?</b> 23 A. Field training is when you're with a 24 senior officer. That senior officer is responsible 25 for maintaining not only your -- your -- your case</p>
Page 26	Page 28
<p>1 <b>Q. June, 2013 you started the St. Louis</b> 2 <b>County Police Academy?</b> 3 A. Yes. 4 <b>Q. And how long did that -- did your time</b> 5 <b>at the Academy last?</b> 6 A. Six months. 7 <b>Q. Were you on a campus? Did you commute</b> 8 <b>from where you lived?</b> 9 A. Yes. 10 <b>Q. Which one of those? Excuse me.</b> 11 A. I commuted. 12 <b>Q. And what did -- talk to us about</b> 13 <b>what -- what sort of Academy training entailed over</b> 14 <b>the course of that six months.</b> 15 A. It was very comprehensive. Not only 16 was it academic but it was physical. "Academic" 17 being from -- everything from how to write a 18 accident report up to a homicide investigation. 19 <b>Q. Okay. I want to come back to the</b> 20 <b>Academy a little bit because that's -- that's going</b> 21 <b>to be an interesting conversation, but I want to get</b> 22 <b>through -- so you -- you spent six months at the</b> 23 <b>Academy. So that takes us to the end of 2013 when</b> 24 <b>you completed your time at the Academy; is that</b> 25 <b>correct?</b></p>	<p>1 file, personal case file, of meeting the standards 2 that St. Louis County has set up being that certain 3 reports have to be written, certain guidelines have 4 to be met of -- sorry. I'm trying to find the 5 best -- best phrasing. 6 <b>Q. Yeah.</b> 7 A. But just like any -- any other line of 8 work, pretty much going back to school and learning 9 the trade. 10 <b>Q. Yeah. Are you aware of what -- did you</b> 11 <b>ever become aware of what the requirements are to</b> 12 <b>serve as a -- as a field instructor? Did I get that</b> 13 <b>term right?</b> 14 A. Yes. 15 <b>Q. Do you know -- did you ever learn what</b> 16 <b>those requirements are? How much more senior you</b> 17 <b>have to be? Is there certain training involved</b> 18 <b>there?</b> 19 A. Yes. It's a one-week completion of a 20 field training school, and it is picked upon by your 21 immediate supervisors of who is designated a field 22 trainer. 23 <b>Q. And is there -- do you have to reach a</b> 24 <b>certain level of seniority in terms of years in the</b> 25 <b>force until you can be sort of nominated to be a</b></p>

7 (Pages 25 to 28)



KEVIN WALSH 2/9/2017

Page 29	Page 31
<p>1 field instructor?</p> <p>2 A. No.</p> <p>3 Q. You just can't be a probationary</p> <p>4 officer?</p> <p>5 A. Correct.</p> <p>6 Q. And is it -- is it the case that your</p> <p>7 field instructor sort of goes on every call with you</p> <p>8 and assists in sort of all facets of the job during</p> <p>9 your probationary period?</p> <p>10 A. Yes.</p> <p>11 Q. And is there a -- is there an</p> <p>12 evaluation or a review process from the field</p> <p>13 instructor to you, the probationary officer?</p> <p>14 A. Yes.</p> <p>15 Q. How often does that happen?</p> <p>16 A. At the end of every phase, and there</p> <p>17 are four phases.</p> <p>18 Q. And so are all phases equal in terms of</p> <p>19 duration?</p> <p>20 A. No.</p> <p>21 Q. So how long is each phase?</p> <p>22 A. The first phase is five weeks. The</p> <p>23 second phase is three. The third phase is four.</p> <p>24 And I believe the fourth phase is three as well.</p> <p>25 Q. Three week -- and those latter ones</p>	<p>1 necessarily looking over you but checking in with</p> <p>2 you to make sure that there's nothing that they can</p> <p>3 help you with or investigations that they could help</p> <p>4 further with you. There are some field trainers</p> <p>5 that kind of just let you go. My three field</p> <p>6 trainers were pretty hands-on.</p> <p>7 Q. Who were your three field trainers?</p> <p>8 A. Officer Mumford.</p> <p>9 Q. How do you spell that?</p> <p>10 A. M-u-m-f-o-r-d.</p> <p>11 Q. Okay.</p> <p>12 A. Officer Wojchiuh -- W-o -- I'm not even</p> <p>13 going to spell it right, but W-o-j-c-h-i-u-h, I</p> <p>14 believe.</p> <p>15 Q. Okay.</p> <p>16 A. And Officer King.</p> <p>17 Q. Officer King?</p> <p>18 A. King.</p> <p>19 Q. So once you're finished with your 17</p> <p>20 weeks -- well, how -- how do those three field</p> <p>21 training officers divide between your 17 weeks?</p> <p>22 A. The first five weeks were with Officer</p> <p>23 Mumford.</p> <p>24 Q. Uh-huh.</p> <p>25 A. And then three weeks were with Officer</p>
Page 30	Page 32
<p>1 you're talking about, when you're stating three,</p> <p>2 you're talking about months?</p> <p>3 A. Three weeks.</p> <p>4 Q. Weeks?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Oh, excuse me. So I apologize.</p> <p>7 Let's -- let's do this again.</p> <p>8 So the phases -- how long are all four</p> <p>9 phases all together?</p> <p>10 A. I believe -- 17 weeks I believe.</p> <p>11 Q. Okay. So is it -- is it correct that</p> <p>12 you're a probationary officer, and immediately once</p> <p>13 you start your time as a probationary officer, you</p> <p>14 start in Phase One, and you go through those four</p> <p>15 phases in a manner of 17 weeks. So after you</p> <p>16 finished those four phases, you're a probationary</p> <p>17 officer still, but you're no longer assisted as</p> <p>18 comprehensively by your field instructor; is that</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And so what does your relationship</p> <p>22 become with your field instructor after those 17</p> <p>23 weeks?</p> <p>24 A. Pretty much what you want to make of</p> <p>25 it. Some field trainers are still out there, not</p>	<p>1 King, four weeks were with Officer Wojchiuh, and</p> <p>2 then I returned to Officer Mumford for the fourth</p> <p>3 phase. And I believe it was the additional three.</p> <p>4 Q. And so after you finished those 17</p> <p>5 weeks, which field instructor do you go to when</p> <p>6 you -- or who are you assisted by of those three?</p> <p>7 A. It's all verbal so I'm not</p> <p>8 necessarily -- nobody physically checks in.</p> <p>9 Q. Uh-huh.</p> <p>10 A. But Officer Mumford and Officer King</p> <p>11 worked in my precinct. Officer Wojchiuh did not</p> <p>12 work in my precinct.</p> <p>13 Q. And did they -- did they continue to</p> <p>14 have check-in conversations or evaluations of you</p> <p>15 during your probationary period?</p> <p>16 A. Not evaluations but check-in.</p> <p>17 Q. And were those more ad hoc sort, of at</p> <p>18 your discretion or their discretion?</p> <p>19 A. Yes.</p> <p>20 Q. So if I've got my math right, in about</p> <p>21 2015 you've -- the beginning of 2015, you've</p> <p>22 completed your probationary period?</p> <p>23 A. Yes.</p> <p>24 Q. And what is your title then?</p> <p>25 A. Police officer.</p>

8 (Pages 29 to 32)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 33	Page 35
<p>1 Q. And has that been your title -- is that</p> <p>2 your title today?</p> <p>3 A. No.</p> <p>4 Q. What is your title today?</p> <p>5 A. Detective.</p> <p>6 Q. So when did you achieve the rank of</p> <p>7 detective?</p> <p>8 A. It was July of '16.</p> <p>9 Q. So tell me a little bit about your</p> <p>10 day-to-day as a -- as a police officer I guess for</p> <p>11 the -- for the year and a half that you were a</p> <p>12 police officer, starting in early 2015 to the middle</p> <p>13 of July of 2016. And I guess just give me a sense</p> <p>14 of what does your typical day look like?</p> <p>15 A. There's nothing necessarily typical.</p> <p>16 But answering radio calls that are dispatched by</p> <p>17 St. Louis County Police communications, calls for</p> <p>18 services for accidents, calls for service for</p> <p>19 shopliftings, robberies, domestics, rape, homicides,</p> <p>20 and then also self-initiated assignments that I use</p> <p>21 my discretion on of making traffic stops or</p> <p>22 pedestrian checks or business contacts, business</p> <p>23 checks, things of that nature.</p> <p>24 Q. The self-initiated work that you just</p> <p>25 described, how did you determine when you were going</p>	<p>1 A. Yes.</p> <p>2 Q. Is it verbal or written guidance?</p> <p>3 A. It is written.</p> <p>4 Q. Do you know where it's written?</p> <p>5 A. In our general order.</p> <p>6 Q. Okay. Do you know which general order?</p> <p>7 A. I do not.</p> <p>8 Q. During your time as a police officer,</p> <p>9 who did you -- who did you immediately report to?</p> <p>10 A. The sergeants and then to the</p> <p>11 lieutenant.</p> <p>12 Q. Who is your -- during your year and a</p> <p>13 half, who was your sergeant? Did you have just one?</p> <p>14 A. No. There are three per platoon. In</p> <p>15 that year and a half I had switched platoons, so</p> <p>16 there are at least six, probably more.</p> <p>17 Q. Okay. And when you report to these</p> <p>18 sergeants, is there any one in particular that you</p> <p>19 are closer to hierarchically, or as a practical</p> <p>20 matter did you -- well -- strike that.</p> <p>21 Were you divided amongst the sergeants</p> <p>22 in any type of way?</p> <p>23 A. No.</p> <p>24 Q. As a practical matter, did you work</p> <p>25 more closely with one of the particular sergeants</p>
Page 34	Page 36
<p>1 to do those or when you were going to dedicate time</p> <p>2 for that?</p> <p>3 A. It all depended on the precinct. So on</p> <p>4 some days, we're pretty busy, and you don't have</p> <p>5 time to do anything self-initiated. There's other</p> <p>6 times where there is no assist car close to you, so</p> <p>7 it puts officers at a disadvantage. Pretty</p> <p>8 dangerous being on your own. So a little more</p> <p>9 reluctant to do self-initiated assignments if</p> <p>10 there's no other officers in service around you.</p> <p>11 Q. During this time, did you have a</p> <p>12 partner?</p> <p>13 A. No.</p> <p>14 Q. And so when you went -- when you</p> <p>15 responded to calls for service, you tended to</p> <p>16 respond to them just yourself?</p> <p>17 A. Depending on the nature of the call,</p> <p>18 but, yes.</p> <p>19 Q. So what is the -- what factors would --</p> <p>20 would sort of militate in favor of going alone</p> <p>21 versus going with someone else?</p> <p>22 A. Disturbances, fights, domestics,</p> <p>23 shootings, things of that nature require two cars.</p> <p>24 Q. When you say "require two cars," is</p> <p>25 that in some sort of guidance that you received?</p>	<p>1 over the others?</p> <p>2 A. No. Sergeants kind of fluctuate so ...</p> <p>3 Q. During your time as a police officer,</p> <p>4 did anyone report to you?</p> <p>5 A. No.</p> <p>6 Q. During your time as a police officer,</p> <p>7 did you ever serve as a field instructor?</p> <p>8 A. Yes.</p> <p>9 Q. At what point did you serve as a field</p> <p>10 instructor?</p> <p>11 A. I believe it was after my second year,</p> <p>12 my second full year as a police officer.</p> <p>13 Q. So that would have been the beginning</p> <p>14 of '16?</p> <p>15 A. Yes.</p> <p>16 Q. And is this how you know about the</p> <p>17 one-week training for field instructors?</p> <p>18 A. Yes.</p> <p>19 Q. And what did that training entail?</p> <p>20 A. It entailed management of people,</p> <p>21 personalities, how to overcome obstacles that a</p> <p>22 young police officer or a supervisor might entail.</p> <p>23 Q. Uh-huh.</p> <p>24 A. Or might encounter.</p> <p>25 Q. Were there any materials that you</p>

9 (Pages 33 to 36)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 37</p> <p>1 received during this instruction?</p> <p>2 A. Yes.</p> <p>3 Q. Do you have any of those materials</p> <p>4 still?</p> <p>5 A. I believe I do.</p> <p>6 MR. HAMILTON: Okay. Mr. Hughes, if</p> <p>7 you don't mind, at some point we'd like to see those</p> <p>8 materials, if possible.</p> <p>9 MR. HUGHES: We'll talk about it. But</p> <p>10 I mean, I don't care but ...</p> <p>11 BY MR. HAMILTON:</p> <p>12 Q. And did you take any notes during this</p> <p>13 instruction?</p> <p>14 A. I believe I did.</p> <p>15 Q. Okay. What's the process of becoming a</p> <p>16 detective like?</p> <p>17 A. A lot of hard work.</p> <p>18 Q. Yeah?</p> <p>19 Is there an application process?</p> <p>20 A. There was a memo.</p> <p>21 Q. A memo that you had to write?</p> <p>22 A. Yes.</p> <p>23 Q. What's the subject of the memo?</p> <p>24 A. Your qualifications.</p> <p>25 Q. And what was the -- were there any</p>	<p style="text-align: right;">Page 39</p> <p>1 determine that the precinct intelligence detectives</p> <p>2 will take certain cases that the road officer either</p> <p>3 wishes not to handle or doesn't necessarily have the</p> <p>4 time or ability to further that investigation.</p> <p>5 Q. As a detective, does anybody report to</p> <p>6 you?</p> <p>7 A. No.</p> <p>8 Q. Who do you report to as a detective?</p> <p>9 A. The sergeant.</p> <p>10 Q. Is it the same group of sergeants that</p> <p>11 you reported to as a -- as a police officer?</p> <p>12 A. No.</p> <p>13 Q. Are these -- how are they different?</p> <p>14 A. It is just one sergeant in this manner.</p> <p>15 Q. Once you became a detective, which</p> <p>16 sergeant did you begin reporting to?</p> <p>17 A. Sergeant Roediger.</p> <p>18 Q. Can you spell that name?</p> <p>19 A. R-o-e-d-i-g-e-r.</p> <p>20 Q. Is this the same sergeant that you</p> <p>21 report to today?</p> <p>22 A. Yes.</p> <p>23 Q. And do you have a particular specialty</p> <p>24 or division that you -- you're responsible for as a</p> <p>25 detective?</p>
<p style="text-align: right;">Page 38</p> <p>1 other aspects of the application process?</p> <p>2 A. There was an interview.</p> <p>3 Q. And how long was the process from the</p> <p>4 time you applied to the time that you learned that</p> <p>5 you were accepted or promoted to -- to be a</p> <p>6 detective?</p> <p>7 A. I'd say weeks.</p> <p>8 Q. And when you became a detective, did</p> <p>9 you -- did your jurisdiction change at all?</p> <p>10 A. No.</p> <p>11 Q. You remained in the same office?</p> <p>12 A. Yes.</p> <p>13 Q. How did your responsibilities change as</p> <p>14 a detective?</p> <p>15 A. Noncall responsive versus as a</p> <p>16 patrolman being call responsive.</p> <p>17 Q. So is it fair to say that as a</p> <p>18 detective -- and I apologize. This comes from just</p> <p>19 not knowing. Are -- is all of your work</p> <p>20 self-initiated?</p> <p>21 A. No.</p> <p>22 Q. How do you receive your work if you're</p> <p>23 not responding to calls?</p> <p>24 A. Road officers will ask for assistance</p> <p>25 or guidance on a particular case. Supervisors</p>	<p style="text-align: right;">Page 40</p> <p>1 A. St. Louis County North County gangs.</p> <p>2 Q. Did you select this?</p> <p>3 A. No.</p> <p>4 Q. How many people are in that -- is it</p> <p>5 fair to call it a unit?</p> <p>6 A. Uh-huh. Two.</p> <p>7 Q. Who else is in that unit?</p> <p>8 A. Detective Rob Brannan.</p> <p>9 Q. Brannan?</p> <p>10 A. Brannan. B-r-a-n-n-a-n.</p> <p>11 Q. Have you ever received a demotion or</p> <p>12 reprimand?</p> <p>13 A. No.</p> <p>14 Q. Aside from this case, are you aware of</p> <p>15 any instance in which your conduct was investigated?</p> <p>16 A. Yes.</p> <p>17 Q. What was that instance or those</p> <p>18 instances?</p> <p>19 A. It was just one. I was informed by</p> <p>20 Bureau of Professional Standards that a complaint</p> <p>21 was filed that I did not show up to a call. It was</p> <p>22 determined that that was not sustained, as my car --</p> <p>23 my car and a witness determined that I was on-scene,</p> <p>24 and my car GPS proved that I was on-scene.</p> <p>25 Q. When did this happen?</p>

10 (Pages 37 to 40)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 41	Page 43
<p>1 A. Probably two years ago.</p> <p>2 <b>Q. During your probationary period?</b></p> <p>3 A. Right around there.</p> <p>4 <b>Q. And who -- did you find out who -- how</b></p> <p>5 <b>did it come to light in the first place?</b></p> <p>6 A. I believe I received an email and then</p> <p>7 a phone call from Bureau of Professional Standards.</p> <p>8 <b>Q. And outside of this instance, no other</b></p> <p>9 <b>instance in which you're aware of that your conduct</b></p> <p>10 <b>was under investigation?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Thank you.</b></p> <p>13 <b>So as I get to that, let's talk a</b></p> <p>14 <b>little bit about the training because that's -- can</b></p> <p>15 <b>you describe in a little bit of detail the -- the</b></p> <p>16 <b>type of training that you received during The Police</b></p> <p>17 <b>Academy?</b></p> <p>18 A. It was academic classroom material,</p> <p>19 different instructors from The Police Academy,</p> <p>20 different guest speakers required several tests,</p> <p>21 quizzes, presentations and -- and then also the</p> <p>22 physical manner, same thing.</p> <p>23 <b>Q. So let's talk about the -- and remind</b></p> <p>24 <b>me. I apologize. I know I asked this. About how</b></p> <p>25 <b>long did the actual Academy last?</b></p>	<p>1 A. Yes.</p> <p>2 <b>Q. What number was your class?</b></p> <p>3 A. 180.</p> <p>4 <b>Q. Did everybody in your class go on to</b></p> <p>5 <b>become a -- a police officer?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. So let's go back to the -- to the</b></p> <p>8 <b>classroom training. You mentioned that some of that</b></p> <p>9 <b>instruction was in law. Can you tell me a little</b></p> <p>10 <b>bit about what you remember about sort of the legal</b></p> <p>11 <b>instruction that you received?</b></p> <p>12 A. It was a state statute specific to</p> <p>13 Missouri and then Constitutional law.</p> <p>14 <b>Q. And who provided that instruction?</b></p> <p>15 A. It was -- Ron Grames was Constitutional</p> <p>16 law.</p> <p>17 <b>Q. How do you spell that name?</b></p> <p>18 A. I believe it is G-r-a-m-e-s.</p> <p>19 <b>Q. So that was Constitutional law?</b></p> <p>20 A. Uh-huh.</p> <p>21 <b>Q. And what about the statutes?</b></p> <p>22 A. That was Officer Keith Emerson of the</p> <p>23 Maryland Heights Police Department.</p> <p>24 <b>Q. Is Officer Emerson a lawyer?</b></p> <p>25 A. No.</p>
Page 42	Page 44
<p>1 A. Six months.</p> <p>2 <b>Q. Six months is what I thought.</b></p> <p>3 <b>Was it classroom instruction for all of</b></p> <p>4 <b>those six months?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. How frequently did that classroom</b></p> <p>7 <b>instruction occur?</b></p> <p>8 A. Every day.</p> <p>9 <b>Q. For how many hours?</b></p> <p>10 A. Roughly it was an eight-hour day. Give</p> <p>11 or take an hour or two, three times a week for</p> <p>12 physical fitness, half hour for lunch. So I'd say</p> <p>13 six to eight.</p> <p>14 <b>Q. So is it fair to say that most of the</b></p> <p>15 <b>Academy training was classroom training?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. And what subjects did this classroom</b></p> <p>18 <b>training cover?</b></p> <p>19 A. It -- it covered ethics, criminal law,</p> <p>20 Constitutional law, criminal investigation,</p> <p>21 domestic, accident investigation. That's all I'm</p> <p>22 coming up with right now.</p> <p>23 <b>Q. And just -- how big was your class?</b></p> <p>24 A. I believe it was 19.</p> <p>25 <b>Q. Did your class have a number?</b></p>	<p>1 <b>Q. And you mentioned that there were</b></p> <p>2 <b>evaluations. About how frequently did these</b></p> <p>3 <b>evaluations on sort of the Constitutional law and</b></p> <p>4 <b>statutory law occur?</b></p> <p>5 A. There are weekly quizzes. Tests</p> <p>6 occurred at the end of -- of certain blocks.</p> <p>7 <b>Q. Was all of this instruction given</b></p> <p>8 <b>in-person?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Is any of it online?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Was there homework?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Based on your recollection, did any of</b></p> <p>15 <b>this training cover wanteds?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. What do you remember about the training</b></p> <p>18 <b>on wanteds from the Academy?</b></p> <p>19 A. I believe it was -- you know, it was</p> <p>20 distinguishing between a wanted and a warrant and</p> <p>21 how a wanted worked, how a warrant worked.</p> <p>22 <b>Q. Do you recall any -- receiving any</b></p> <p>23 <b>materials along these lines?</b></p> <p>24 A. No.</p> <p>25 <b>Q. So this -- based on your recollection,</b></p>

11 (Pages 41 to 44)

KEVIN WALSH 2/9/2017

Page 45	Page 47
<p>1 the instruction on -- on wanteds and warrants was</p> <p>2 verbal instruction?</p> <p>3 A. Yes.</p> <p>4 Q. Was there any electronic materials,</p> <p>5 PowerPoints, anything like that?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you recall, given the context of --</p> <p>8 of the -- the time that you spent on the legal</p> <p>9 instruction, how many hours or how many classes</p> <p>10 you-all spent on wanteds?</p> <p>11 A. I don't know.</p> <p>12 Q. You mentioned that some of the</p> <p>13 instruction was on the distinction between wanteds</p> <p>14 and warrants. What is that distinction?</p> <p>15 A. A warrant is signed by a judge versus a</p> <p>16 wanted is determine -- determined by the officer</p> <p>17 that probable cause exists to arrest a subject.</p> <p>18 Q. Was -- based on your recollection, was</p> <p>19 this definition of a wanted the one that was given</p> <p>20 during your Police Academy instruction?</p> <p>21 A. Yes.</p> <p>22 Q. And how is probable cause defined or</p> <p>23 explained during your instruction?</p> <p>24 A. It's reasonable -- a reason to believe</p> <p>25 that a crime has been committed by a subject.</p>	<p>1 investigations.</p> <p>2 Q. Were there ever -- did it ever include</p> <p>3 any more formal instruction, like in a classroom?</p> <p>4 A. There is quarterly in-service that</p> <p>5 St. Louis County mandates.</p> <p>6 Q. Is this part of field instruction, or</p> <p>7 is this separate and part?</p> <p>8 A. This is separate.</p> <p>9 Q. Okay. Let's -- let's go back to that.</p> <p>10 But as far as field instruction, were</p> <p>11 there ever -- was there ever an occasion when your</p> <p>12 field instructor said, you know, now we're going to</p> <p>13 sit in a classroom and -- and read some books on the</p> <p>14 law or policy?</p> <p>15 A. Not in the classroom.</p> <p>16 Q. Okay.</p> <p>17 A. More of a patrol vehicle. But reading</p> <p>18 general orders.</p> <p>19 Q. Reading general orders?</p> <p>20 A. Uh-huh.</p> <p>21 Q. So you would read general orders with</p> <p>22 your field instructor?</p> <p>23 A. Yes.</p> <p>24 Q. Was this -- was this formalized in any</p> <p>25 way, or was this more of a conversation?</p>
Page 46	Page 48
<p>1 Q. And was this -- was this definition</p> <p>2 applicable to both wanteds and warrants?</p> <p>3 A. Yes.</p> <p>4 Q. And so based on your understanding from</p> <p>5 The Police Academy that -- the only difference</p> <p>6 between a wanted and a warrant was the fact that a</p> <p>7 warrant required the signature of a judge; is that</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. What do you recall from the -- your</p> <p>11 Academy training -- strike that.</p> <p>12 Did you receive any training once you</p> <p>13 completed the Police Academy?</p> <p>14 A. Yes.</p> <p>15 Q. What type of training did you receive</p> <p>16 following the Police Academy?</p> <p>17 A. Field training.</p> <p>18 Q. What does field training consist of? I</p> <p>19 know you answered it a little bit, but I'd like to</p> <p>20 sort of get it in the context of what the Academy</p> <p>21 training was, so I'll ask the question again.</p> <p>22 What did field training consist of?</p> <p>23 A. It consisted of a senior officer</p> <p>24 responding to calls with you, coaching you through</p> <p>25 certain calls, and guiding you to further</p>	<p>1 A. More of a conversation.</p> <p>2 Q. And in the course of the field</p> <p>3 instruction, do you recall any occasion in which the</p> <p>4 topic of wanteds was discussed?</p> <p>5 A. Not a specific one, no.</p> <p>6 Q. So is that a "yes" but not</p> <p>7 specifically?</p> <p>8 A. Yes.</p> <p>9 Q. So just to -- just to ask it a</p> <p>10 different way, did you discuss wanteds with your</p> <p>11 field instruction officer --</p> <p>12 A. Yes.</p> <p>13 Q. -- or trainer?</p> <p>14 What do you recall those conversations</p> <p>15 consisted of?</p> <p>16 A. How to properly go about issuing a</p> <p>17 wanted, the steps that needed to be taken for a</p> <p>18 wanted to actually come to light.</p> <p>19 Q. Talk to me a little bit about what you</p> <p>20 recall about the steps, the correct steps that</p> <p>21 needed to be taken in order to take in order for a</p> <p>22 wanted to come to light.</p> <p>23 A. Probable cause had to be determined.</p> <p>24 Once probable cause was determined on a subject or</p> <p>25 subjects, depending on the case, a supervisor was</p>

12 (Pages 45 to 48)



KEVIN WALSH 2/9/2017

Page 49	Page 51
<p>1 notified, and then the CARE operator was notified.</p> <p>2 <b>Q. What steps did -- would an officer take</b></p> <p>3 <b>in order to make a probable cause determination?</b></p> <p>4 A. Based on facts that were given at the</p> <p>5 scene.</p> <p>6 <b>Q. Can you say a little bit more about</b></p> <p>7 <b>that? Facts given on the scene by whom?</b></p> <p>8 A. By significant others, family members,</p> <p>9 friends, sometimes store owners that determined that</p> <p>10 a crime has been committed and notify the police.</p> <p>11 And the facts are given to the police officer, and</p> <p>12 the police officer determines if probable cause does</p> <p>13 exist that a crime had been committed by that said</p> <p>14 subject.</p> <p>15 <b>Q. Did -- in the course of a Police</b></p> <p>16 <b>Academy or in your field instruction, did anybody</b></p> <p>17 <b>ever talk about a threshold or a certain set of</b></p> <p>18 <b>factors and components that meant that you'd</b></p> <p>19 <b>achieved or reached probable cause?</b></p> <p>20 A. No.</p> <p>21 <b>Q. But as you said, it was really based on</b></p> <p>22 <b>talking to the people at the scene and gathering the</b></p> <p>23 <b>facts?</b></p> <p>24 A. Yes.</p> <p>25 <b>Q. So let's talk a little bit about you</b></p>	<p>1 <b>Q. Do you recall any of those in-service</b></p> <p>2 <b>trainings covering the topics of -- or the topic of</b></p> <p>3 <b>probable cause determinations?</b></p> <p>4 A. Not to my knowledge.</p> <p>5 <b>Q. What about when and whether to pursue</b></p> <p>6 <b>or issue a warrant?</b></p> <p>7 A. No.</p> <p>8 <b>Q. Now, as far as training in general,</b></p> <p>9 <b>what were you taught about when you should take</b></p> <p>10 <b>steps to issue a wanted versus pursuing a warrant?</b></p> <p>11 A. Could you rephrase, please?</p> <p>12 <b>Q. Sure.</b></p> <p>13 <b>Did -- in the course of your training,</b></p> <p>14 <b>what did you learn about when it was appropriate to</b></p> <p>15 <b>issue a wanted and when it was appropriate to pursue</b></p> <p>16 <b>a warrant?</b></p> <p>17 A. One would be the subject is not</p> <p>18 on-scene. So therefore, even though probable cause</p> <p>19 was determined, the subject isn't on-scene so the</p> <p>20 subject could not be taken into custody at that</p> <p>21 time. And through numerous investigations,</p> <p>22 Prosecuting Attorney's Office has determined that</p> <p>23 they wished to have the suspect interviewed before a</p> <p>24 warrant would be issued.</p> <p>25 <b>Q. Talk to me about that second part. You</b></p>
Page 50	Page 52
<p>1 mentioned that one final -- not final but that next</p> <p>2 category, in-service training, quarterly in-service</p> <p>3 training. Do I understand it correctly that that</p> <p>4 means it happened every four months?</p> <p>5 A. Yes.</p> <p>6 <b>Q. And where would that in-service</b></p> <p>7 <b>training take place?</b></p> <p>8 A. St. Louis County Police Academy.</p> <p>9 <b>Q. And how long would that in-service</b></p> <p>10 <b>training be?</b></p> <p>11 A. It's a full workday.</p> <p>12 <b>Q. And who has to attend those in-service</b></p> <p>13 <b>trainings?</b></p> <p>14 A. Everybody employed by St. Louis County</p> <p>15 Police Department.</p> <p>16 <b>Q. And what do those in-service trainings</b></p> <p>17 <b>entail?</b></p> <p>18 A. They entail academics, legal updates,</p> <p>19 firearms training.</p> <p>20 <b>Q. Do you recall any of those in-service</b></p> <p>21 <b>trainings relating to wanteds?</b></p> <p>22 A. No.</p> <p>23 <b>Q. So you don't recall any in-service</b></p> <p>24 <b>training ever covering the topic of wanteds?</b></p> <p>25 A. No.</p>	<p>1 said -- and I'm just reading it from the transcript</p> <p>2 here -- through numerous investigations,</p> <p>3 prosecuting -- the Prosecuting Attorney's Office has</p> <p>4 determined that they wished to have the suspect</p> <p>5 interviewed before a warrant would be issued.</p> <p>6 <b>Is -- is what -- is that statement</b></p> <p>7 <b>instruction that you've received from the</b></p> <p>8 <b>Prosecuting Attorney's Office about the requirements</b></p> <p>9 <b>for issuing a warrant?</b></p> <p>10 A. Just verbal.</p> <p>11 <b>Q. Verbal from whom?</b></p> <p>12 A. Prosecuting Attorney's Office.</p> <p>13 <b>Q. Have you had conversations with members</b></p> <p>14 <b>of the Prosecuting Attorney's Office about sort of</b></p> <p>15 <b>what they need before they will issue or approve of</b></p> <p>16 <b>or pursue, I guess, a -- a warrant?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. And have they said anything in addition</b></p> <p>19 <b>to the fact that they want numerous investigations?</b></p> <p>20 A. No.</p> <p>21 <b>Q. So how do you interpret -- how do you</b></p> <p>22 <b>interpret that requirement of numerous</b></p> <p>23 <b>investigations? Does it mean that in order to</b></p> <p>24 <b>pursue a wanted, you need to conduct more than one</b></p> <p>25 <b>investigation of the particular subject for whom you</b></p>

13 (Pages 49 to 52)

KEVIN WALSH 2/9/2017

Page 53	Page 55
<p>1 want to get a warrant?</p> <p>2 MR. HUGHES: Maybe I object. Maybe I</p> <p>3 missed something, but I'm not quite sure where this</p> <p>4 "numerous investigations" came in. Maybe he said</p> <p>5 that. I just don't remember, so I'm just --</p> <p>6 MR. HAMILTON: It is --</p> <p>7 MR. HUGHES: -- not quite clear on</p> <p>8 where this question came from, but it might be my</p> <p>9 fault.</p> <p>10 MR. HAMILTON: So I'll ask the question</p> <p>11 again.</p> <p>12 <b>Q. Did you ever receive any instruction,</b></p> <p>13 <b>particular instruction from the Prosecuting</b></p> <p>14 <b>Attorney's Office, that they needed numerous --</b></p> <p>15 <b>numerous investigations, as in more than one</b></p> <p>16 <b>investigation, in order to issue a warrant or to</b></p> <p>17 <b>pursue a warrant?</b></p> <p>18 A. No. I -- I was stating that over the</p> <p>19 course of numerous investigations that I've worked,</p> <p>20 that is what they have -- have asked, not they don't</p> <p>21 want numerous investigations. I was stating --</p> <p>22 <b>Q. Okay. So let me clarify. Over the</b></p> <p>23 <b>course of numerous investigations that you've</b></p> <p>24 <b>participated in, you have learned that the</b></p> <p>25 <b>Prosecuting Attorney's Office wants what in order to</b></p>	<p>1 misstate anything. In order for you to pursue a</p> <p>2 warrant, you need to conduct a formal investigation</p> <p>3 of an individual, and that formal investigation</p> <p>4 entails speaking with them face-to-face?</p> <p>5 Mike, he can clarify if --</p> <p>6 MR. HUGHES: No, no. I think he said</p> <p>7 for a warrant. Maybe he might have said for --</p> <p>8 might have wanted to say for a warrant --</p> <p>9 MR. HAMILTON: No, I meant -- I meant</p> <p>10 warrant.</p> <p>11 MR. HUGHES: I'm sorry.</p> <p>12 MR. HAMILTON: That's okay.</p> <p>13 Yeah, I'll repeat the question.</p> <p>14 MR. HUGHES: I apologize for the</p> <p>15 interruption then.</p> <p>16 MR. HAMILTON: Not a problem.</p> <p>17 <b>Q. So if I'm understanding you correctly,</b></p> <p>18 <b>based on the several investigations that you've</b></p> <p>19 <b>participated in, and conversations with the</b></p> <p>20 <b>Prosecuting Attorney's Office, before they will</b></p> <p>21 <b>pursue a warrant, they want the officer to have a</b></p> <p>22 <b>formal interview with the suspect, and that formal</b></p> <p>23 <b>interview entails a face-to-face meeting?</b></p> <p>24 A. Yes.</p> <p>25 <b>Q. So do you understand the purpose of a</b></p>
Page 54	Page 56
<p>1 pursue a warrant?</p> <p>2 A. An interview of the subject.</p> <p>3 <b>Q. And have they specified what an</b></p> <p>4 <b>interview of the subject actually means?</b></p> <p>5 A. No.</p> <p>6 <b>Q. How do you interpret that interview</b></p> <p>7 <b>requirement of the subject?</b></p> <p>8 A. Subject is taken into custody, subject</p> <p>9 is Mirandized, and a formal interview is conducted</p> <p>10 by officer or officers.</p> <p>11 <b>Q. What is a formal interview?</b></p> <p>12 A. I would say subject is -- like I said,</p> <p>13 Mirandized, talked about the facts that were given</p> <p>14 in a particular case and offered the ability to give</p> <p>15 their side of the story.</p> <p>16 <b>Q. Is it possible to have an official --</b></p> <p>17 <b>sorry, a formal interview at the scene?</b></p> <p>18 A. Potentially.</p> <p>19 <b>Q. Is it possible to have a formal</b></p> <p>20 <b>interview over the phone?</b></p> <p>21 A. No.</p> <p>22 <b>Q. Why not?</b></p> <p>23 A. I can't determine who that person is.</p> <p>24 <b>Q. So you're saying in order for -- and</b></p> <p>25 <b>please correct me if I'm wrong. I'm not trying to</b></p>	<p>1 wanted to allow an officer to formally interview the</p> <p>2 suspect in a crime?</p> <p>3 A. Yes.</p> <p>4 <b>Q. Does a -- does a wanted serve any other</b></p> <p>5 <b>purpose?</b></p> <p>6 A. No.</p> <p>7 <b>Q. So to be clear -- strike that.</b></p> <p>8 <b>You mentioned that through several</b></p> <p>9 <b>investigations and conversations with the</b></p> <p>10 <b>Prosecuting Attorney's Office, you've developed this</b></p> <p>11 <b>understanding. Is there a particular person at the</b></p> <p>12 <b>Prosecuting Attorney's Office who you've had</b></p> <p>13 <b>these -- that you recall who you've had these</b></p> <p>14 <b>specific conversations with?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Various folks in that office over time?</b></p> <p>17 A. (Nods head.)</p> <p>18 <b>Q. Is the understanding that we just</b></p> <p>19 <b>discussed, is that written down anywhere?</b></p> <p>20 A. No. Not to my knowledge.</p> <p>21 <b>Q. So the understanding that you explained</b></p> <p>22 <b>is something that -- that you've developed and is</b></p> <p>23 <b>a -- is the practice that you follow; is that</b></p> <p>24 <b>correct?</b></p> <p>25 A. Yes.</p>

14 (Pages 53 to 56)



KEVIN WALSH 2/9/2017

Page 57	Page 59
<p>1 Q. Is that the practice, to your 2 knowledge, that other officers follow? 3 A. Yes. 4 Q. And is there any other type of 5 guidance, unwritten, that you're aware of kind of 6 captures this purpose of a wanted and the 7 requirements for a warrant? 8 A. No. 9 Q. Does the Prosecuting Attorney's Office 10 ever specifically request or ask that an officer or 11 that you issue a wanted? 12 A. No. 13 Q. How many wanteds have you issued -- 14 created? 15 A. No idea. 16 Q. Is it more than ten? 17 A. Yes. 18 Q. More than 50? 19 A. I can't say for certain. 20 Q. And how many warrants -- how many 21 warrant applications have you pursued or completed? 22 A. Lots. 23 Q. More than ten? 24 A. Yes. 25 Q. More than 50?</p>	<p>1 taken under advisement. 2 MR. HAMILTON: I can rephrase. 3 MR. HUGHES: Okay. 4 BY MR. HAMILTON: 5 Q. What have been the reasons that you've 6 received from the Prosecuting Attorney's Office that 7 warrants that you've applied for have been denied? 8 A. The lack of victim cooperation, 9 sometimes outside of the statute of limitations, off 10 the top of my head. 11 MR. HAMILTON: So let's do this: We've 12 been going for about an hour. Let's take a short 13 break and come back. I understand we've got a 14 packed day, so I'm fine with it being five 15 minutes -- 16 MR. HUGHES: Fine with me. 17 MR. HAMILTON: -- so people can stretch 18 their legs. 19 THE VIDEOGRAPHER: The time is 10:37. 20 We are off the record. 21 (Recess taken.) 22 THE VIDEOGRAPHER: The time is 10:45. 23 We are back on the record. 24 BY MR. HAMILTON: 25 Q. Thanks so much, Officer Walsh.</p>
Page 58	Page 60
<p>1 A. Likely. 2 Q. And on any of those occasions -- let's 3 talk about the warrants. On any of those occasions, 4 have you been told -- had that warrant application 5 been rejected or denied? 6 A. Yes. 7 Q. What have been the reasons for those 8 denials? 9 A. Taken under -- taken under advisement 10 or lack of -- lack of victim cooperation. 11 Q. And so taken under advisement is a -- 12 is a denial? 13 A. Potentially. 14 Q. What happens? Does it just sit there 15 and nothing happens to it? 16 A. I can't speak on -- on behalf of the 17 prosecutors. 18 Q. How have you determined that it was -- 19 you -- you placed that in the category of warrant 20 applications that have been denied. So how did 21 you -- why did you place it in the category of 22 denials? 23 MR. HUGHES: Well, I'm not sure if he 24 placed them in the category of denials. I think he 25 did, but -- but I think he said sometimes they're</p>	<p>1 Now, just to close the loop here, 2 we've -- we've been talking about the trainings that 3 you've received, and we were talking about wanteds 4 and warrants. 5 Just to give you a little bit of a 6 roadmap, I want to keep going with trainings for a 7 little bit, and I want to talk a little bit more 8 about wanteds as you might suspect and some of the 9 general orders, and then we can get to some of what 10 this case is about. Just so you have a sense of 11 where I'm going. 12 Are you familiar with REJIS? 13 A. Yes. 14 Q. What is REJIS? 15 A. It's a regional system -- law 16 enforcement system. 17 Q. And what relationship do you have with 18 REJIS? 19 A. That is the system that St. Louis 20 County contracts with that we utilize. 21 Q. Is it the only system? 22 A. No. 23 Q. What are the other systems? 24 A. MULES, NCIC. 25 Q. Are those all of the systems that you</p>

15 (Pages 57 to 60)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 61	Page 63
<p>1 use?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Are there any others?</p> <p>4 A. No.</p> <p>5 Q. Did you ever receive any training from</p> <p>6 REJIS?</p> <p>7 A. Yes.</p> <p>8 Q. What type of training did you receive?</p> <p>9 A. I believe it's called operator --</p> <p>10 operator training, how to navigate through --</p> <p>11 through the system.</p> <p>12 Q. Can you give a little bit of a</p> <p>13 description? Doesn't have to be technical in terms</p> <p>14 of what that entails.</p> <p>15 A. As simple as pretty much what button</p> <p>16 does what, what -- what button will give you certain</p> <p>17 information versus others.</p> <p>18 Q. Did any of the trainings or any of</p> <p>19 the -- the guides relate to wanteds or warrants?</p> <p>20 A. Potentially.</p> <p>21 Q. I'm going to show you a document. This</p> <p>22 is a document that is marked DEF-RFP40000001. And</p> <p>23 we'll hand it over to you momentarily.</p> <p>24 I'm going to mark this as Walsh</p> <p>25 Exhibit 1.</p>	<p>1 of what is page 3 of both documents, there is a date</p> <p>2 that says "Updated" followed by a date; do you see</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. Do you see that on what has been marked</p> <p>6 as Exhibit 1, the updated date is January 2016; is</p> <p>7 that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And on the document marked Exhibit 2,</p> <p>10 it is updated July 2014; is that correct?</p> <p>11 A. Yes.</p> <p>12 Q. Would you -- if you indulge me and turn</p> <p>13 each page one more time and look to your left,</p> <p>14 you'll see each page has a stick figure scratching</p> <p>15 their head; do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. And to the left of that stick figure,</p> <p>18 it says "Record Types" underneath "Wanted versus</p> <p>19 Warrant." Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And I'm going to read from Exhibit 2</p> <p>22 first for "Wanted" right underneath "Record Types."</p> <p>23 It reads, "Wanted, the police are interested in</p> <p>24 questioning a subject prior to asking for a judge's</p> <p>25 order. Wanted records are maintained in REJIS but</p>
Page 62	Page 64
<p>1 (Exhibit 1 was marked for</p> <p>2 identification.)</p> <p>3 BY MR. HAMILTON:</p> <p>4 Q. I'm going to pass that to you.</p> <p>5 Mr. Hughes, a copy for you.</p> <p>6 And just for efficiency purposes, I'm</p> <p>7 also going to provide you with another document.</p> <p>8 This is marked DEF-SUPP0000022.</p> <p>9 And we're going to mark this as Walsh</p> <p>10 Exhibit 2.</p> <p>11 (Exhibit 2 was marked for</p> <p>12 identification.)</p> <p>13 MR. HAMILTON: Here's a copy for you</p> <p>14 and a copy for you, Mr. Hughes.</p> <p>15 Q. If you have enough space to put these</p> <p>16 side by side, do you agree, Officer -- or excuse</p> <p>17 me -- Detective Walsh -- is that the correct</p> <p>18 designation?</p> <p>19 A. Yes.</p> <p>20 Q. Detective Walsh, that they both say on</p> <p>21 the front cover "Wanted Entry"?</p> <p>22 A. Yes.</p> <p>23 Q. And if you turn the first page of</p> <p>24 each -- it's a coordinated process, I know -- would</p> <p>25 you agree that if you take a look down at the bottom</p>	<p>1 not MULES and NCIC."</p> <p>2 Did I read that accurately?</p> <p>3 A. Yes.</p> <p>4 Q. Now, I'm going to read from Exhibit 1,</p> <p>5 in the same section, and I'm going to read the</p> <p>6 language as follows:</p> <p>7 "Wanted, subject is wanted for</p> <p>8 questioning. There is no warrant associated with</p> <p>9 the record. The law enforcement officer entering</p> <p>10 the wanted information must have probable cause to</p> <p>11 believe that the person committed the crime prior to</p> <p>12 entering a REJIS wanted on that person."</p> <p>13 Did I read that accurately?</p> <p>14 A. Yes.</p> <p>15 Q. Detective Walsh, would you agree with</p> <p>16 me that the language in Exhibit 2 for the definition</p> <p>17 of a wanted does not include the words "probable</p> <p>18 cause"?</p> <p>19 A. Yes.</p> <p>20 Q. And would you agree that the language</p> <p>21 in Exhibit 1 for the definition of a wanted does</p> <p>22 contain probable cause?</p> <p>23 A. Yes.</p> <p>24 Q. Do you happen to know why probable</p> <p>25 cause was not included in the definition in</p>

16 (Pages 61 to 64)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 65	Page 67
<p>1 Exhibit 2, the document of Jane -- of July, 2014?</p> <p>2 A. No.</p> <p>3 Q. Was probable cause part of a</p> <p>4 determination of a wanted in July, 2014?</p> <p>5 A. Could you rephrase, please?</p> <p>6 Q. As a police officer who served in the</p> <p>7 St. Louis County Police Department in July of 2014,</p> <p>8 was probable cause a requirement for issuing a</p> <p>9 wanted?</p> <p>10 A. Yes.</p> <p>11 MR. HUGHES: Okay. I was just going to</p> <p>12 object because he had answered it before but he</p> <p>13 answered it again. That's okay.</p> <p>14 BY MR. HAMILTON:</p> <p>15 Q. Why do you think that the language in</p> <p>16 these two definitions of a wanted is different?</p> <p>17 MR. HUGHES: My objection, it was asked</p> <p>18 and answered about 60 seconds ago. So repetitive.</p> <p>19 BY MR. HAMILTON:</p> <p>20 Q. You may answer the question.</p> <p>21 A. I don't know.</p> <p>22 Q. Are you aware of any events in between</p> <p>23 the publication of these two exhibits that may have</p> <p>24 caused for the inclusion -- strike that.</p> <p>25 Are you aware of any events in between</p>	<p>1 Q. Is it accurate that the supervisor</p> <p>2 authorization was not a part of wanteds previous</p> <p>3 to -- strike that.</p> <p>4 You previously said the supervisor</p> <p>5 approval based on probable cause is now required.</p> <p>6 When you said "now required," were you referring to</p> <p>7 a particular time period as to when that changed?</p> <p>8 A. No. I was just stating that a</p> <p>9 supervisor now has to be named in the report saying</p> <p>10 that the wanted, based on your probable cause, is</p> <p>11 authorized.</p> <p>12 Q. And what I'm asking is about your use</p> <p>13 of the word "now." Prior to the "now," such</p> <p>14 designation of the supervisor's approval was not</p> <p>15 required?</p> <p>16 That's poorly phrased. I apologize.</p> <p>17 What time -- during what time period</p> <p>18 was an officer's -- the designation of the</p> <p>19 supervising officer's authorization not required in</p> <p>20 the narrative of the report, of the wanted report?</p> <p>21 MR. HUGHES: Maybe it's clear to him,</p> <p>22 but I'm just objecting because the question just</p> <p>23 does not seem clear to me. It's ambiguous. So I</p> <p>24 object to the form.</p> <p>25 BY MR. HAMILTON:</p>
Page 66	Page 68
<p>1 the publication of these two reports that resulted</p> <p>2 in a different definition for a wanted in these</p> <p>3 manuals?</p> <p>4 A. No.</p> <p>5 Q. Do you recall any conversations outside</p> <p>6 of trainings about the requirements for</p> <p>7 wanteds -- strike that.</p> <p>8 Have you spoken with fellow officers</p> <p>9 about the requirements for wanteds since July 2014?</p> <p>10 A. Yes.</p> <p>11 Q. What have these conversations consisted</p> <p>12 of?</p> <p>13 A. That supervisor approval based on</p> <p>14 probable cause facts in particular cases is now</p> <p>15 required.</p> <p>16 Q. You said that supervisor approval based</p> <p>17 on probable cause facts in particular cases is now</p> <p>18 required. Does that mean that it was not required</p> <p>19 beforehand?</p> <p>20 A. No. It was required. But supervisors</p> <p>21 who authorize the wanted now goes into the narrative</p> <p>22 of the CARE report for St. Louis County.</p> <p>23 Q. Are you aware of why that change was</p> <p>24 made?</p> <p>25 A. No.</p>	<p>1 Q. Would you like me to rephrase, or did</p> <p>2 you understand my question?</p> <p>3 A. Could you please rephrase?</p> <p>4 Q. Sure.</p> <p>5 Based on your recollection, was there a</p> <p>6 time in which a supervisor's -- the inclusion of a</p> <p>7 supervisor's authorization needed to be included in</p> <p>8 a wanted report?</p> <p>9 A. No.</p> <p>10 Q. So it's always been the case that</p> <p>11 you've needed to designate the supervisor's approval</p> <p>12 in the narrative of the report?</p> <p>13 A. No.</p> <p>14 Q. When did that change? When did that</p> <p>15 become required?</p> <p>16 A. I don't know the exact date, but the</p> <p>17 update to our last general order.</p> <p>18 Q. Okay, thank you.</p> <p>19 Thank you for bearing with me on that</p> <p>20 question. Okay. I think we can put this to the</p> <p>21 side.</p> <p>22 So just to -- to close this off, we</p> <p>23 talked about your Academy training. We talked about</p> <p>24 in-service training. We talked about field</p> <p>25 training. We talked about training or manuals from</p>

17 (Pages 65 to 68)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 69</p> <p>1 REJIS. Is there any training that comes to mind for</p> <p>2 you on the topic of wanteds and warrants that I</p> <p>3 didn't cover?</p> <p>4 A. No.</p> <p>5 Q. So that -- that captures the universe?</p> <p>6 A. Yes.</p> <p>7 Q. Have you participated as an instructor</p> <p>8 in any trainings on wanteds and warrants?</p> <p>9 A. No.</p> <p>10 Q. Let's dig into wanteds a little bit.</p> <p>11 Am I correct that your -- in your prior</p> <p>12 testimony 15, 20 minutes ago is that you said the</p> <p>13 purpose of a wanted is to give an officer an</p> <p>14 opportunity to conduct a formal investigation of a</p> <p>15 suspect -- formal interview of a suspect?</p> <p>16 A. After probable cause was determined,</p> <p>17 yes.</p> <p>18 Q. And to be clear, is this -- based on</p> <p>19 your conversations and interactions with other</p> <p>20 officers and detectives in the St. Louis County</p> <p>21 Police Department, is this understanding of the</p> <p>22 purpose of a wanted shared amongst your colleagues?</p> <p>23 A. Yes.</p> <p>24 Q. And is that definition of purpose</p> <p>25 written anywhere that you're aware of?</p>	<p style="text-align: right;">Page 71</p> <p>1 upon arriving on the scene?</p> <p>2 A. Contact the reporting party.</p> <p>3 Q. And what does that contact consist of?</p> <p>4 A. Asking them to -- as simple as why --</p> <p>5 why were we called to the scene.</p> <p>6 Q. And after determining why you were</p> <p>7 called to the scene, what in general happens next?</p> <p>8 A. Gather the reporting party's pedigree</p> <p>9 information, their statement, and then I contact</p> <p>10 witnesses.</p> <p>11 Q. And so you've done all of this contact</p> <p>12 in the factual investigation. At what point in time</p> <p>13 do you make a determination that perhaps a wanted is</p> <p>14 justified?</p> <p>15 A. Every case is different. But if the</p> <p>16 suspect isn't on scene and attempts to contact them,</p> <p>17 we met with negative results.</p> <p>18 Q. What does attempts -- what does</p> <p>19 "negative results" mean?</p> <p>20 A. Attempts to contact them at their</p> <p>21 residence or place of work or via telephone.</p> <p>22 Q. And if you're able to contact that</p> <p>23 person via telephone, what is the next step?</p> <p>24 A. I -- I first try and get them to</p> <p>25 identify themselves to verify that -- who I am</p>
<p style="text-align: right;">Page 70</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. Are you aware of other jurisdictions</p> <p>3 that use wanteds?</p> <p>4 A. No.</p> <p>5 Q. Why do you think wanteds are used in</p> <p>6 St. Louis County?</p> <p>7 A. Based off of the testimony that I just</p> <p>8 gave, that it's -- before probable cause is</p> <p>9 determined, the wanted is placed out for the suspect</p> <p>10 to conduct a formal interview if the suspect is not</p> <p>11 on scene.</p> <p>12 Q. Are you aware of any distinguishing</p> <p>13 factors that make St. Louis County different from</p> <p>14 other jurisdictions in Missouri or other parts of</p> <p>15 the country?</p> <p>16 A. I know everybody does something a</p> <p>17 little different.</p> <p>18 Q. So let's walk through the process of --</p> <p>19 of actually creating a wanted. You -- you started</p> <p>20 doing that -- and I appreciate you indulging me to</p> <p>21 come back and revisit this topic.</p> <p>22 So you receive a call -- this is as a</p> <p>23 police officer -- you receive a call to come to --</p> <p>24 come to a scene where -- from which the call</p> <p>25 originated. What type of investigation do you do</p>	<p style="text-align: right;">Page 72</p> <p>1 potentially talking to and then try and set up a</p> <p>2 meeting spot, whether it be at the police station,</p> <p>3 on-scene, or another, you know, undisclosed</p> <p>4 location.</p> <p>5 Q. And so if a person identifies</p> <p>6 themselves over the phone, but they're not</p> <p>7 interested in -- in meeting you, what's the next</p> <p>8 step?</p> <p>9 A. Since probable cause was already</p> <p>10 determined, the wanted would be placed out.</p> <p>11 Q. Okay. Or presumably if you're unable</p> <p>12 to make contact with that person but you still have</p> <p>13 made a probable cause determination; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. So you're now ready to issue the</p> <p>16 wanted. And I apologize for making this so basic,</p> <p>17 but literally, what is the next thing that you do in</p> <p>18 the wanted creation process?</p> <p>19 A. I contact the CARE operator and advise</p> <p>20 them of my report number, the suspect's pedigree</p> <p>21 information, and charges that would -- would be</p> <p>22 issued.</p> <p>23 Q. And so you are -- I'm placing you --</p> <p>24 you're at the scene. You're investigating. You</p> <p>25 pick up your phone or your radio and you call in to</p>

18 (Pages 69 to 72)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 73	Page 75
<p>1 the CARE provider. Where is the CARE provider</p> <p>2 sitting, or the CARE officer?</p> <p>3 A. They're sitting at their office which</p> <p>4 was -- was now Clayton and is now unincorporated</p> <p>5 West -- West County.</p> <p>6 Q. And you say, I am here to -- I'm</p> <p>7 calling to initiate a wanted on John Doe. Here is</p> <p>8 the pedigree information, here's -- here are the</p> <p>9 facts. Is there anything else that goes -- that</p> <p>10 happens in that conversation?</p> <p>11 A. No.</p> <p>12 Q. So you -- how long does that</p> <p>13 conversation typically take?</p> <p>14 A. Five minutes.</p> <p>15 Q. Five minutes.</p> <p>16 So you have a five-minute conversation</p> <p>17 and after you hang up the phone or sort of close off</p> <p>18 the -- the radio call, is -- does that mean that the</p> <p>19 wanted has been created?</p> <p>20 A. To my knowledge, yes.</p> <p>21 Q. And so it goes into the system?</p> <p>22 A. (Nods head.)</p> <p>23 Q. And so if -- and now we're going to get</p> <p>24 a little technical, so I apologize but -- so it's --</p> <p>25 it's gone into the system. Let's say five minutes</p>	<p>1 which a supervisor has not approved a wanted?</p> <p>2 MR. HUGHES: Well, I think your first</p> <p>3 question was has that ever happened to him? Now --</p> <p>4 MR. HAMILTON: Well, now I'm asking --</p> <p>5 I'm asking a second question, Mr. Hughes.</p> <p>6 MR. HUGHES: Okay. Okay.</p> <p>7 THE WITNESS: No.</p> <p>8 BY MR. HAMILTON:</p> <p>9 Q. You're not aware of it?</p> <p>10 And is it -- how many levels of</p> <p>11 approval are there in the wanted creation process?</p> <p>12 A. That I don't know.</p> <p>13 Q. So -- and do you know how long about --</p> <p>14 just in your experience, how long the creation -- or</p> <p>15 the approval process for a wanted will take?</p> <p>16 A. No.</p> <p>17 Q. Do you know what the -- have you</p> <p>18 yourself ever served as a -- as a supervisor for</p> <p>19 wanted authorization purposes?</p> <p>20 A. No.</p> <p>21 Q. Do you know what goes into the process</p> <p>22 of reviewing a wanted from the supervisor's</p> <p>23 perspective?</p> <p>24 A. No.</p> <p>25 Q. In instances where you have initiated</p>
Page 74	Page 76
<p>1 later an officer encounters John Doe at some other</p> <p>2 location. Will that officer be able to learn that</p> <p>3 this person has a wanted out against them?</p> <p>4 A. Yes.</p> <p>5 Q. Within -- so -- so it happens like</p> <p>6 that? (Snaps fingers.)</p> <p>7 A. I believe so.</p> <p>8 Q. What role then does a -- does a</p> <p>9 supervisor play in the wanted creation process?</p> <p>10 A. Once they review the report and</p> <p>11 determine that probable cause is in existence, then</p> <p>12 they approve the report.</p> <p>13 Q. So is there -- I'm trying to wrap my</p> <p>14 head around this. If -- is -- is there any lag time</p> <p>15 between when you hung up the phone with the CARE</p> <p>16 officer and when the supervisor approves the wanted</p> <p>17 where the wanted is not active, or is it immediately</p> <p>18 active?</p> <p>19 A. I can't speak for -- for CARE, but I</p> <p>20 believe it's immediately active.</p> <p>21 Q. So is it possible -- have you</p> <p>22 encountered instances where a supervisor will --</p> <p>23 will not approve the creation of a wanted?</p> <p>24 A. No.</p> <p>25 Q. You've never heard of an instance in</p>	<p>1 or issued a wanted, what interaction or what contact</p> <p>2 do you have with the -- the supervisor who's</p> <p>3 approving the wanted? Is there a conversation?</p> <p>4 A. Not on every -- on every case but some,</p> <p>5 yes.</p> <p>6 Q. And so in some cases, you might find</p> <p>7 out that the supervisors approved it just by looking</p> <p>8 at the entry, the teletype in -- in REJIS, I</p> <p>9 suppose?</p> <p>10 A. Based on the facts that were laid out</p> <p>11 in the report.</p> <p>12 Q. Based on the facts that were laid out</p> <p>13 in the report because it indicates that a supervisor</p> <p>14 has approved it?</p> <p>15 A. Could you rephrase that?</p> <p>16 Q. Sure.</p> <p>17 So I was asking how -- how you know</p> <p>18 that a supervisor has approved your -- the creation</p> <p>19 of the wanted that you initiated. And you said</p> <p>20 sometimes -- sometimes there's a conversation that</p> <p>21 you have with that supervising officer, but</p> <p>22 sometimes not.</p> <p>23 And in the instances where you don't</p> <p>24 have a conversation with the supervising officer,</p> <p>25 how do you ultimately find out that it has been</p>

19 (Pages 73 to 76)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 77</p> <p>1 approved? And you said it -- I think you said, but</p> <p>2 correct me if I'm wrong, it would appear in the</p> <p>3 report?</p> <p>4 A. When you access CARE, the computer</p> <p>5 report system, it would show that a supervisor has</p> <p>6 approved it. It would be stamped.</p> <p>7 Q. And so -- and -- and just to be clear,</p> <p>8 and I may -- I may have already covered this and I</p> <p>9 apologize. But do you know when in -- sort of how</p> <p>10 quickly a supervisor will review the wanted that</p> <p>11 you've created or initiated?</p> <p>12 A. No. It's up to their -- their</p> <p>13 discretion.</p> <p>14 Q. What are the requirements for serving</p> <p>15 as a supervisor for approving a wanted?</p> <p>16 A. I don't know.</p> <p>17 Q. In the instances -- so let's take --</p> <p>18 think about one of the officers who's approved</p> <p>19 wanteds that you've initiated. Are they -- are they</p> <p>20 your same seniority year?</p> <p>21 A. No.</p> <p>22 Q. How much -- are they your same rank?</p> <p>23 A. No.</p> <p>24 Q. What rank are they, typically?</p> <p>25 A. Sergeant and above.</p>	<p style="text-align: right;">Page 79</p> <p>1 supervising officer is there with you and it's</p> <p>2 through -- after conversation with them that you go</p> <p>3 ahead and issue the warrant --</p> <p>4 A. Yes.</p> <p>5 Q. -- the wanted? Excuse me.</p> <p>6 Okay. So let's talk about one of the</p> <p>7 instances in which the supervisor approval has come</p> <p>8 after you've created the wanted. How long did that</p> <p>9 conversation happen after you created the wanted?</p> <p>10 A. Some instances are the next day. Some</p> <p>11 are hours.</p> <p>12 Q. And thinking about one of those</p> <p>13 conversations, what was the -- the content of that</p> <p>14 conversation?</p> <p>15 A. Furthering the investigation of where I</p> <p>16 may -- may be able to contact certain witnesses</p> <p>17 again, or victims, just to help further the</p> <p>18 investigation.</p> <p>19 Q. And are these -- and so am I</p> <p>20 understanding correctly that they will approve the</p> <p>21 wanted and say you should also do these things to</p> <p>22 further your investigation?</p> <p>23 A. Sometimes.</p> <p>24 Q. Do they tell you to further your</p> <p>25 investigation in order to achieve probable cause?</p>
<p style="text-align: right;">Page 78</p> <p>1 Q. Sergeant and above can serve as an</p> <p>2 approver for a wanted?</p> <p>3 A. Yes.</p> <p>4 Q. Are you aware of lieutenants approving</p> <p>5 wanteds?</p> <p>6 A. I suppose.</p> <p>7 Q. Let's walk through -- you said that</p> <p>8 sometimes you had a conversation with -- with the --</p> <p>9 with the supervising officer about a wanted that</p> <p>10 you've created. If you think about one of those</p> <p>11 instances, how long after you initiated that wanted</p> <p>12 did that conversation happen?</p> <p>13 MR. HUGHES: Are you assuming that it's</p> <p>14 always after, or are you excluding "before" in your</p> <p>15 question?</p> <p>16 Well, anyway, I object to the form of</p> <p>17 the question. It's vague --</p> <p>18 BY MR. HAMILTON:</p> <p>19 Q. Is it -- is it true that the</p> <p>20 conversations that you've had -- strike that.</p> <p>21 In your experience, does supervisor</p> <p>22 approval necessarily come after you've created the</p> <p>23 wanted?</p> <p>24 A. No. Sometimes it's on-scene.</p> <p>25 Q. So there are instances in which the</p>	<p style="text-align: right;">Page 80</p> <p>1 A. No.</p> <p>2 Q. Why do they tell you to further your</p> <p>3 investigation, or why have they told you to further</p> <p>4 your investigation?</p> <p>5 A. Sometimes there's more charges that can</p> <p>6 be sought and making sure that, you know, in some</p> <p>7 instances that maybe certain businesses have video</p> <p>8 surveillance that we would maybe be able to access</p> <p>9 to show these events unfolding, things that would</p> <p>10 help with the prosecution.</p> <p>11 Q. So if I'm understanding you correctly,</p> <p>12 these conversations that have happened after you</p> <p>13 have initiated the wanted are essentially an</p> <p>14 approval of the wanted, and then further steps you</p> <p>15 can take as far as additional information you can</p> <p>16 gather or other charges you can bring?</p> <p>17 A. Yes.</p> <p>18 Q. And are you aware of any type of</p> <p>19 approval that's required after the supervisor's</p> <p>20 approval?</p> <p>21 A. No, I'm not.</p> <p>22 Q. Are you aware of any training that</p> <p>23 supervising officers receive in when and whether to</p> <p>24 approve of a wanted that's been created?</p> <p>25 A. No, I'm not.</p>

20 (Pages 77 to 80)

KEVIN WALSH 2/9/2017

Page 81	Page 83
<p>1 Q. In the course of your conversations</p> <p>2 with a supervising officer, have they ever said you</p> <p>3 should go ahead and apply for a warrant?</p> <p>4 A. No. I'm sorry. Can you -- could you</p> <p>5 kind of clarify?</p> <p>6 Q. Sure.</p> <p>7 You have a conversation with the</p> <p>8 supervising officer after you've initiated the</p> <p>9 wanted and it becomes live. In the course of that</p> <p>10 conversation, have you ever had an instance in which</p> <p>11 the supervising officer says you should apply for a</p> <p>12 warrant?</p> <p>13 A. Instead of the wanted?</p> <p>14 Q. Instead -- instead of the wanted or in</p> <p>15 addition to the wanted?</p> <p>16 A. No.</p> <p>17 Q. Do you ever receive any guidance from a</p> <p>18 supervising officer or anyone else about when and</p> <p>19 whether to apply for a warrant?</p> <p>20 A. Could you repeat it, please? I'm</p> <p>21 sorry.</p> <p>22 Q. Sure.</p> <p>23 Do you ever receive any guidance from a</p> <p>24 supervising officer or anyone else as to when you</p> <p>25 should apply for a warrant?</p>	<p>1 a determination as to when a warrant is justified?</p> <p>2 A. In every case where probable cause</p> <p>3 exists that a crime has been committed, a warrant</p> <p>4 is -- is justified of seeking.</p> <p>5 Q. But in many of those instances you --</p> <p>6 you issue a wanted as opposed to a warrant; is that</p> <p>7 correct?</p> <p>8 A. Well, if somebody is in custody, then I</p> <p>9 would seek a warrant. If somebody is not in</p> <p>10 custody, I would seek a wanted.</p> <p>11 Q. Because a wanted is -- the purpose of</p> <p>12 the wanted is for that formal interview?</p> <p>13 A. Correct.</p> <p>14 Q. Is it the case in your experience that</p> <p>15 a warrant is always preceded by a wanted?</p> <p>16 A. Yes.</p> <p>17 Q. So we were walking -- we were walking</p> <p>18 down the --</p> <p>19 MR. HUGHES: Nevermind. Just object to</p> <p>20 the form of the last question. The fact that you</p> <p>21 made it "always." So -- it's just overbroad.</p> <p>22 MR. HAMILTON: Okay.</p> <p>23 MR. HUGHES: Okay.</p> <p>24 BY MR. HAMILTON:</p> <p>25 Q. So we've -- I just -- so I want to go</p>
Page 82	Page 84
<p>1 A. Yes.</p> <p>2 Q. Can you describe when those instances</p> <p>3 occur?</p> <p>4 A. If somebody is in custody, and based on</p> <p>5 certain facts on the actual crime that had been</p> <p>6 committed. Sometimes immediate warrant application</p> <p>7 is to be conducted through the prosecuting attorneys</p> <p>8 and sometimes it -- supervisors, based on certain</p> <p>9 facts, can be released pending application of</p> <p>10 warrant.</p> <p>11 Q. What types of facts would -- strike</p> <p>12 that.</p> <p>13 In what types of instances would</p> <p>14 somebody be released pending the application of a</p> <p>15 warrant?</p> <p>16 A. Drug arrest.</p> <p>17 Q. Can you say a little bit more about</p> <p>18 the -- the analysis that goes into that</p> <p>19 determination like with the drug arrest?</p> <p>20 A. Somebody that is not necessarily a</p> <p>21 threat to themselves or the community immediately.</p> <p>22 Q. That's helpful. So talk to me about</p> <p>23 the -- the factors. You said that you've applied</p> <p>24 for numerous warrants. What type of analysis goes</p> <p>25 through your head as a detective when you're making</p>	<p>1 back to -- to our timeline. The wanted has been --</p> <p>2 the wanted has been created basically on-scene</p> <p>3 through your conversation with the CARE officer.</p> <p>4 The approval process happens either on-scene or</p> <p>5 sometime thereafter. And what happens to -- to the</p> <p>6 individual who has a -- has a wanted out on them?</p> <p>7 And let me ask a question that you can actually</p> <p>8 answer.</p> <p>9 A police officer encounters this</p> <p>10 individual who has a wanted out for them. What is</p> <p>11 the next step if you are that police officer and</p> <p>12 you've encountered a person who has a wanted out?</p> <p>13 A. If -- if knowing based on such as</p> <p>14 myself being familiar with the case, I would take</p> <p>15 that -- that suspect into custody. Somebody not</p> <p>16 necessarily knowing the particulars of the case, a</p> <p>17 system check of the individual being -- or providing</p> <p>18 his -- his or her pedigree, the officer would</p> <p>19 conduct that record check to verify that, in fact,</p> <p>20 there is a wanted out for his or her arrest. And</p> <p>21 then they would take that person into custody if</p> <p>22 there is.</p> <p>23 Q. And if you are -- and just to be clear,</p> <p>24 you said this is an officer who was not familiar</p> <p>25 with the case; is that correct?</p>

21 (Pages 81 to 84)



KEVIN WALSH 2/9/2017

Page 85	Page 87
<p>1 A. Yes.</p> <p>2 <b>Q. So if you are an officer who's familiar</b></p> <p>3 <b>with the case and you encounter this person with a</b></p> <p>4 <b>wanted, what happens then?</b></p> <p>5 A. I would take them into custody based --</p> <p>6 knowing that there is probable cause.</p> <p>7 <b>Q. Even if you're -- if you -- you know</b></p> <p>8 <b>the person and you're aware of their involvement in</b></p> <p>9 <b>the case, you would still take them into custody?</b></p> <p>10 A. Yes. Based on if there's probable</p> <p>11 cause.</p> <p>12 <b>Q. Is it possible to conduct a -- a formal</b></p> <p>13 <b>interview without taking somebody into custody?</b></p> <p>14 A. Potentially, yes.</p> <p>15 <b>Q. In your experience, is it -- is it</b></p> <p>16 <b>possible to conduct such a formal interview and</b></p> <p>17 <b>clear the wanted without taking a person into</b></p> <p>18 <b>custody?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Have you ever done that?</b></p> <p>21 A. Could you --</p> <p>22 <b>Q. Yeah.</b></p> <p>23 A. -- rephrase, please?</p> <p>24 <b>Q. Yeah.</b></p> <p>25 So has there ever come a time when you</p>	<p>1 types of crimes where the purpose is actually to</p> <p>2 bring somebody into custody where you then conduct</p> <p>3 the formal interview?</p> <p>4 A. Yes.</p> <p>5 <b>Q. Is that written anywhere?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. Do you recall where that's written --</b></p> <p>8 <b>where that's written, where that guidance exists?</b></p> <p>9 A. The general order on domestics</p> <p>10 discusses not exact terminology.</p> <p>11 <b>Q. Sure.</b></p> <p>12 A. But where a 24-hour hold would be</p> <p>13 placed on all domestic violence cases, whether it be</p> <p>14 misdemeanor, felony.</p> <p>15 <b>Q. That's helpful. Thank you.</b></p> <p>16 Have you ever -- have you ever sort of</p> <p>17 encountered an instance in which you were able to</p> <p>18 conduct a formal interview of somebody who was</p> <p>19 wanted without arresting them?</p> <p>20 A. Yes, the scenario that -- that I gave</p> <p>21 previous.</p> <p>22 <b>Q. So I guess even taking a step -- a step</b></p> <p>23 <b>further back, without -- without handcuffing them</b></p> <p>24 <b>and just conducting a formal interview, just without</b></p> <p>25 <b>the person in any form of -- of custody?</b></p>
Page 86	Page 88
<p>1 have encountered somebody who has a wanted out</p> <p>2 against them, you're familiar with their case, and</p> <p>3 you've been able to conduct a formal interview</p> <p>4 without taking them into custody, and clear the</p> <p>5 wanted?</p> <p>6 A. Yes. I believe like a shoplifting case</p> <p>7 or something along those lines where somebody has</p> <p>8 been identified, probable cause was established, the</p> <p>9 person was put out wanted, and I encountered them,</p> <p>10 arrested them, conducted an interview, and released</p> <p>11 on-scene, whether it be on summons or warrant</p> <p>12 application being made.</p> <p>13 <b>Q. So we talked about instances in which</b></p> <p>14 <b>you could conduct a formal investigation without</b></p> <p>15 <b>taking somebody into custody. Can you describe</b></p> <p>16 <b>instances in which it wouldn't be possible to</b></p> <p>17 <b>conduct such a formal investigation and thus you'd</b></p> <p>18 <b>be required to actually take them into custody?</b></p> <p>19 A. Domestic cases, anything violent,</p> <p>20 felonies, specifically gun cases.</p> <p>21 <b>Q. So is it -- is it then -- is it the</b></p> <p>22 <b>policy that -- just going back to the purpose of a</b></p> <p>23 <b>wanted is to be able to conduct a formal interview</b></p> <p>24 <b>of somebody, is there kind of a carve-out or a</b></p> <p>25 <b>caveat for certain types of offenses or certain</b></p>	<p>1 A. I suppose, but nothing --</p> <p>2 <b>Q. Not in your experience?</b></p> <p>3 A. No, sir.</p> <p>4 <b>Q. Okay. So let's go back to the instance</b></p> <p>5 <b>in which you are -- you're an officer who is not</b></p> <p>6 <b>familiar with the case, but you encounter the</b></p> <p>7 <b>person. You run their name and information. You</b></p> <p>8 <b>find out there's a wanted. As the reporting</b></p> <p>9 <b>officer, what do you do? You -- you take them into</b></p> <p>10 <b>custody, but who do you -- do you contact anybody?</b></p> <p>11 A. The officer that made the arrest or the</p> <p>12 officer that has --</p> <p>13 <b>Q. The officer who made the arrest.</b></p> <p>14 <b>Right. So you're the officer who made the arrest.</b></p> <p>15 <b>You're not familiar with the person, but you know</b></p> <p>16 <b>there's a wanted. What are the steps that you take?</b></p> <p>17 A. I would contact the St. Louis County</p> <p>18 Records Department to verify that it is still an</p> <p>19 active wanted.</p> <p>20 <b>Q. Okay.</b></p> <p>21 A. And then after verification is made, I</p> <p>22 would contact St. Louis County CARE to cancel the</p> <p>23 wanted.</p> <p>24 <b>Q. Okay. Now, you said to ensure that the</b></p> <p>25 <b>wanted is active. What does that mean?</b></p>

22 (Pages 85 to 88)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 89	Page 91
<p>1 A. It's just checking with our record</p> <p>2 department to make sure that it is -- is, in fact,</p> <p>3 an active wanted.</p> <p>4 <b>Q. Are there inactive wanteds?</b></p> <p>5 A. That I can't speak of. I've never</p> <p>6 encountered one but ...</p> <p>7 <b>Q. Is that -- that's -- that's the</b></p> <p>8 <b>protocol?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Have you heard of any inactive wanteds?</b></p> <p>11 A. I'm sure there -- there have been.</p> <p>12 <b>Q. Is -- in any sort of training or</b></p> <p>13 <b>guidance, have you -- has -- has an inactive wanted</b></p> <p>14 <b>been described, like what it would look like?</b></p> <p>15 A. It wouldn't look like anything</p> <p>16 different to us, no.</p> <p>17 <b>Q. But based on your understanding, the</b></p> <p>18 <b>CARE operator might say this is inactive because --</b></p> <p>19 <b>fill in the blank? Is there -- is there any sense</b></p> <p>20 <b>of why it would be inactive?</b></p> <p>21 A. I mean, certain municipalities have</p> <p>22 said you can release them on a court date.</p> <p>23 <b>Q. And that would be the basis -- I'm not</b></p> <p>24 <b>sure I follow. So that would be the basis for</b></p> <p>25 <b>making a determination that the wanted is not</b></p>	<p>1 <b>Q. And the location to --</b></p> <p>2 A. To take the prisoner.</p> <p>3 <b>Q. And how is that location determined?</b></p> <p>4 A. It's based upon a number of factors, a</p> <p>5 supervisor has to determine.</p> <p>6 <b>Q. Okay. And once you take them to</b></p> <p>7 <b>wherever they're going, what happens next?</b></p> <p>8 A. Then I would contact CARE and inform</p> <p>9 CARE that I had the person in custody. The officer</p> <p>10 that has the wanted, I would contact them, and then</p> <p>11 the CARE operator would cancel the wanted.</p> <p>12 <b>Q. So -- so the wanted, based upon now</b></p> <p>13 <b>that you've got this person in custody, based on</b></p> <p>14 <b>your understanding, the wanted is then immediately</b></p> <p>15 <b>canceled?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. And so now what happens when you</b></p> <p>18 <b>contact the officer who initiated the wanted? How</b></p> <p>19 <b>does that conversation go?</b></p> <p>20 A. I just let him or her know that their</p> <p>21 suspect, based on whatever particular case it is, I</p> <p>22 have them in custody and I let them know the</p> <p>23 location that I'm going to, and I let them know what</p> <p>24 time I picked them up.</p> <p>25 <b>Q. Great.</b></p>
Page 90	Page 92
<p>1 <b>active?</b></p> <p>2 A. Based upon County records, that -- that</p> <p>3 would be, I guess, their determination. But I don't</p> <p>4 see anything different when -- when I'm conducting a</p> <p>5 record check.</p> <p>6 <b>Q. Got it.</b></p> <p>7 <b>And how do you conduct a record check?</b></p> <p>8 A. Via computer.</p> <p>9 <b>Q. And where is that computer?</b></p> <p>10 A. Either in your car or in my case,</p> <p>11 office.</p> <p>12 <b>Q. Okay. So you encounter somebody.</b></p> <p>13 <b>You -- you run their name through your computer,</b></p> <p>14 <b>which may be in your car, you find out that there's</b></p> <p>15 <b>a wanted out. You're not familiar with this person.</b></p> <p>16 <b>You call the Records Department. You determine that</b></p> <p>17 <b>the wanted is active. Did I describe the sequence</b></p> <p>18 <b>correctly?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. So you've now determined that</b></p> <p>21 <b>it's active and you're going to take the person.</b></p> <p>22 <b>And what happens next?</b></p> <p>23 A. Then I contact the watch commander over</p> <p>24 the radio and ask for a location, whether it be the</p> <p>25 precinct or Clayton.</p>	<p>1 <b>And why do you let them know what time</b></p> <p>2 <b>you picked them up?</b></p> <p>3 A. Because they have 24 hours to conduct</p> <p>4 their interview.</p> <p>5 <b>Q. And as the arresting officer, you --</b></p> <p>6 <b>does -- what happens once you have delivered the</b></p> <p>7 <b>person to wherever they're going? Does your</b></p> <p>8 <b>responsibility continue any further?</b></p> <p>9 A. You write either an original report or</p> <p>10 a supplement to that officer's original report on</p> <p>11 the probable cause.</p> <p>12 <b>Q. And after that, is there anything</b></p> <p>13 <b>further that you, as the arresting officer, do?</b></p> <p>14 A. No.</p> <p>15 <b>Q. Now, I want to put you into the shoes</b></p> <p>16 <b>of -- of the officer who initiated the wanted. You</b></p> <p>17 <b>just received the call. What do you do?</b></p> <p>18 A. I guess it depends on when, where,</p> <p>19 where I'm at. So if I'm contacted while on duty, I</p> <p>20 would respond to whichever location, whether it be</p> <p>21 Clayton or the precinct, and conduct my interview.</p> <p>22 <b>Q. And if you're not on duty?</b></p> <p>23 A. If I'm not on duty, if it's in the</p> <p>24 middle of the night, I don't answer my phone.</p> <p>25 <b>Q. Okay.</b></p>

23 (Pages 89 to 92)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 93	Page 95
<p>1 A. So I guess it would -- it would start</p> <p>2 when my day started in the morning.</p> <p>3 <b>Q. Got it.</b></p> <p>4 <b>Are there guidelines for how an officer</b></p> <p>5 <b>is expected to respond to a call that their wanted</b></p> <p>6 <b>has been -- or the individual for whom a wanted is</b></p> <p>7 <b>out has been arrested?</b></p> <p>8 A. Within 24 hours.</p> <p>9 <b>Q. Are there -- is there any further</b></p> <p>10 <b>guidance published by the St. Louis County Police</b></p> <p>11 <b>Department?</b></p> <p>12 A. Not to my knowledge, no.</p> <p>13 <b>Q. Is there any guidance on when within</b></p> <p>14 <b>those 24 hours an officer is expected to try and</b></p> <p>15 <b>conduct the formal interview with the wanted</b></p> <p>16 <b>individual?</b></p> <p>17 A. No.</p> <p>18 <b>Q. But it just has to be within 24 hours?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. And so you now -- let's just -- let's</b></p> <p>21 <b>close the loop. So you -- you've arrived and you</b></p> <p>22 <b>are face-to-face with the subject of your wanted.</b></p> <p>23 <b>You try and speak to them. Once you speak to them,</b></p> <p>24 <b>does that end the -- end the custody?</b></p> <p>25 A. Not always.</p>	<p>1 it is in St. Louis County and it is a St. Louis</p> <p>2 County wanted, they would be given priority. But as</p> <p>3 far as other jurisdictions, I can't speak for that.</p> <p>4 <b>Q. So if it's a St. Louis County wanted</b></p> <p>5 <b>and a St. Louis County warrant, what's the priority</b></p> <p>6 <b>there?</b></p> <p>7 A. The officer with the 20 -- with the</p> <p>8 24-hour hold on the wanted would go first.</p> <p>9 <b>Q. Got it.</b></p> <p>10 <b>So it sounds to me like three instances</b></p> <p>11 <b>that you've described where an individual who is in</b></p> <p>12 <b>custody pursuant to a wanted wouldn't be immediately</b></p> <p>13 <b>released following a formal interview. Are there</b></p> <p>14 <b>others that you can think of?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Okay. So in those instances, even</b></p> <p>17 <b>after you've spoken to somebody and gotten now the</b></p> <p>18 <b>information you can get out, they would still remain</b></p> <p>19 <b>in custody for 24 hours -- for the remainder of the</b></p> <p>20 <b>24 hours; is that correct?</b></p> <p>21 MR. HUGHES: Wait, wait. I'm not sure</p> <p>22 I understand the question. So I object --</p> <p>23 MR. HAMILTON: Sure.</p> <p>24 MR. HUGHES: -- to the form.</p> <p>25 BY MR. HAMILTON:</p>
Page 94	Page 96
<p>1 <b>Q. Why wouldn't it?</b></p> <p>2 A. Whether I'm applying for warrants on</p> <p>3 the person in custody --</p> <p>4 <b>Q. Uh-huh.</b></p> <p>5 A. -- or on domestic cases.</p> <p>6 <b>Q. Okay. Let's break those down. Well,</b></p> <p>7 <b>let me ask a separate question. Are those the only</b></p> <p>8 <b>two instances in which a person wouldn't be</b></p> <p>9 <b>immediately released following your formal interview</b></p> <p>10 <b>of them?</b></p> <p>11 A. No. It's not the only one.</p> <p>12 <b>Q. Are there others that you -- that come</b></p> <p>13 <b>to mind?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. What are those other instances?</b></p> <p>16 A. If they have other warrants.</p> <p>17 <b>Q. Just to be clear, if a person is -- is</b></p> <p>18 <b>arrested and they have -- there's both a warrant and</b></p> <p>19 <b>a wanted out, first of all, is that possible?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. Would they be separate matters?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. Does -- is there any sort of priority</b></p> <p>24 <b>in terms of the warrant and the wanted?</b></p> <p>25 A. The -- the officer with the wanted, if</p>	<p>1 <b>Q. In those three instances that you</b></p> <p>2 <b>described, domestic violence -- and I guess it's two</b></p> <p>3 <b>categories because you've got outstanding warrants.</b></p> <p>4 <b>I apologize. It is three categories because you</b></p> <p>5 <b>might be applying for a warrant, it might be</b></p> <p>6 <b>domestic violence, and there might be an outstanding</b></p> <p>7 <b>warrant.</b></p> <p>8 <b>Outside of those three instances, a</b></p> <p>9 <b>person should be released from custody once they've</b></p> <p>10 <b>participated in the formal interview with the</b></p> <p>11 <b>officer who initiated the wanted; is that correct?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. What if a person is in custody and</b></p> <p>14 <b>they've said that they're not interested in being</b></p> <p>15 <b>interviewed or talking to the police officer? What</b></p> <p>16 <b>happens next?</b></p> <p>17 A. And it's outside of those three</p> <p>18 instances?</p> <p>19 <b>Q. Yes.</b></p> <p>20 A. Two officers' discretion based upon the</p> <p>21 case, whether warrants will be applied for in</p> <p>22 custody or release pending application of warrant.</p> <p>23 <b>Q. So the only reason -- and I just want</b></p> <p>24 <b>to make sure I'm characterizing this right, and</b></p> <p>25 <b>please let me know if I'm wrong. The only reason</b></p>

24 (Pages 93 to 96)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 97</p> <p>1 that a person who says that they're not interested</p> <p>2 in being interviewed would continue to be held in</p> <p>3 custody would be because a warrant is being applied</p> <p>4 for?</p> <p>5 A. Not the only instance, no.</p> <p>6 Q. What are the other instances?</p> <p>7 A. Warrants or --</p> <p>8 Q. And domestic violence?</p> <p>9 A. -- domestic violence.</p> <p>10 Q. Got it.</p> <p>11 But that's -- that captures the</p> <p>12 universe?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And is it -- is it your</p> <p>15 understanding that as soon as -- strike that. We</p> <p>16 can move on.</p> <p>17 Have you ever become aware of an</p> <p>18 investigation by the Department of Justice into the</p> <p>19 Ferguson Police Department?</p> <p>20 A. Partly, yes.</p> <p>21 Q. When you say "partly," what does that</p> <p>22 mean?</p> <p>23 A. I didn't read the whole report but I'm</p> <p>24 aware.</p> <p>25 Q. You're aware of it?</p>	<p style="text-align: right;">Page 99</p> <p>1 any changes to St. Louis County based on the</p> <p>2 Department of Justice report?</p> <p>3 A. No.</p> <p>4 Q. Do you -- do you recall any new</p> <p>5 training that you received in light of this report</p> <p>6 or in light of the events of Ferguson?</p> <p>7 A. Yes.</p> <p>8 Q. What trainings were those?</p> <p>9 A. Civil -- civil disturbance.</p> <p>10 Q. And what did that entail?</p> <p>11 A. Went over Constitutional rights, giving</p> <p>12 verbal warning, and then tactics to keep officers</p> <p>13 safe, communities safe, and those -- those doing the</p> <p>14 civil disturbance.</p> <p>15 Q. Yeah. Yeah. Did you ever participate</p> <p>16 in any conversations or events outside of the office</p> <p>17 related to those topics that you just described?</p> <p>18 A. Could you repeat -- rephrase, please.</p> <p>19 Q. Sure.</p> <p>20 Did you ever participate in any -- any</p> <p>21 conversations outside of -- I asked you about</p> <p>22 conversations you had with your colleagues. Did you</p> <p>23 ever participate in any events or conversations with</p> <p>24 folks outside of the St. Louis County Police</p> <p>25 Department on some of the issues related to the</p>
<p style="text-align: right;">Page 98</p> <p>1 A. Yes.</p> <p>2 Q. What -- what -- can you describe your</p> <p>3 awareness of it?</p> <p>4 A. Just their practices of law enforcement</p> <p>5 in courts.</p> <p>6 Q. What parts of the report did you read?</p> <p>7 A. Just pretty much what the St. Louis</p> <p>8 Post Dispatch put out there, short version.</p> <p>9 Q. Okay. Did anybody -- do you recall any</p> <p>10 conversations within your department once this</p> <p>11 report was released?</p> <p>12 A. Yes.</p> <p>13 Q. Did any of those conversations entail</p> <p>14 the use of wanteds?</p> <p>15 A. Not to my knowledge, no.</p> <p>16 Q. Do you recall anything changes --</p> <p>17 excuse me. Strike that.</p> <p>18 Do you recall anything changing in the</p> <p>19 St. Louis County policies or practices following</p> <p>20 that Department of Justice report?</p> <p>21 A. I'm sure. I mean, I don't know</p> <p>22 specifics, but a lot has changed in a couple years.</p> <p>23 Q. Do you recall any in-service trainings</p> <p>24 or any -- any other trainings or sort of group</p> <p>25 meetings among -- within your department discussing</p>	<p style="text-align: right;">Page 100</p> <p>1 Ferguson sort of instances or the report that</p> <p>2 followed?</p> <p>3 A. Yes.</p> <p>4 Q. What were those?</p> <p>5 A. Everybody wants to ask a police officer</p> <p>6 their opinion.</p> <p>7 Q. Okay.</p> <p>8 A. I tend not to share my opinion with</p> <p>9 anybody but, you know, close family.</p> <p>10 Q. Okay.</p> <p>11 A. But, you know, just what changes I see</p> <p>12 in not only St. Louis County but in law enforcement</p> <p>13 in general. And then community relations.</p> <p>14 Q. Conversations you've had around</p> <p>15 community relations? Are these -- are these all</p> <p>16 conversations that you're discussing that you've had</p> <p>17 with your close family and friends?</p> <p>18 A. Yes.</p> <p>19 Q. Anything outside of that?</p> <p>20 A. No. People, you know, if they see</p> <p>21 coming to or from work, I've had people stop me on</p> <p>22 the street and say, Hey, what's going on? I don't</p> <p>23 even know the person.</p> <p>24 Q. Got it, okay.</p> <p>25 A. And so different conversations with</p>

25 (Pages 97 to 100)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 101	Page 103
<p>1 different types of people.</p> <p>2 <b>Q. Great. Thank you.</b></p> <p>3 <b>So I want to ask you a little bit --</b></p> <p>4 <b>we've talked a little bit about the general orders</b></p> <p>5 <b>and procedures of the St. Louis County Police</b></p> <p>6 <b>Department. So let's dive into those a little bit.</b></p> <p>7 <b>So can you grab 13?</b></p> <p>8 <b>I'm going to show you a document.</b></p> <p>9 <b>So this is a document with Bates</b></p> <p>10 <b>identifier DEFRFP2340000013. I'm marking it as</b></p> <p>11 <b>Walsh Exhibit 3.</b></p> <p>12 <b>(Exhibit 3 was marked for</b></p> <p>13 <b>identification.)</b></p> <p>14 <b>BY MR. HAMILTON:</b></p> <p>15 <b>Q. Handing it to you.</b></p> <p>16 <b>And Mr. Hughes, a copy for you.</b></p> <p>17 <b>Detective Walsh, do you recognize this</b></p> <p>18 <b>document?</b></p> <p>19 <b>A. Yes.</b></p> <p>20 <b>Q. Can you read for me what the -- the</b></p> <p>21 <b>title of the document is at the top center of the</b></p> <p>22 <b>page?</b></p> <p>23 <b>A. "Teletype and REJIS Terminal Policy."</b></p> <p>24 <b>Q. Yeah. And above that at the very top</b></p> <p>25 <b>of the page?</b></p>	<p>1 to subsection C, it reads as follows, and I guess</p> <p>2 just confirm that I've read this correctly.</p> <p>3 "The case officer must inform the</p> <p>4 CARE/Records Clerk of the desired extradition limits</p> <p>5 for any wanted person entries. When the suspect is</p> <p>6 detained by a law enforcement agency based on the</p> <p>7 wanted entry, the case officer will be notified and</p> <p>8 is responsible for the suspect being picked up</p> <p>9 and/or interviewed. The Prisoner Conveyance Unit</p> <p>10 will only respond to adjoining Missouri counties,</p> <p>11 and a suspect cannot be extradited across state</p> <p>12 lines without a warrant."</p> <p>13 <b>Did I read that correctly?</b></p> <p>14 <b>A. Yes.</b></p> <p>15 <b>Q. Why do you think all of these</b></p> <p>16 <b>requirements are reserved for the case officer?</b></p> <p>17 <b>A. Their familiarity.</b></p> <p>18 <b>Q. And would you agree that it's also</b></p> <p>19 <b>based on the case officer's familiarity that they're</b></p> <p>20 <b>designated as the person responsible for the suspect</b></p> <p>21 <b>being picked up and/or interviewed?</b></p> <p>22 <b>MR. HUGHES: Well, object to the form</b></p> <p>23 <b>of the question. It's -- it's vague and calls for</b></p> <p>24 <b>speculation and conjecture as to what you mean by</b></p> <p>25 <b>that.</b></p>
Page 102	Page 104
<p>1 <b>A. "Departmental General Order 11-26."</b></p> <p>2 <b>Q. Great.</b></p> <p>3 <b>Was this a general order that was in</b></p> <p>4 <b>effect during your time as a police officer?</b></p> <p>5 <b>A. Yes.</b></p> <p>6 <b>Q. I want to direct your attention to --</b></p> <p>7 <b>to the second page. You'll see Section B. It's</b></p> <p>8 <b>titled "Wanted Warrants." Do you see that?</b></p> <p>9 <b>A. Yes.</b></p> <p>10 <b>Q. Subsection A states that "Only case</b></p> <p>11 <b>officers shall request wanted person entries."</b></p> <p>12 <b>What is a case officer?</b></p> <p>13 <b>A. The officer that has -- that controls</b></p> <p>14 <b>the scene. So depending on beat responsibility,</b></p> <p>15 <b>each precinct is broken down into beats.</b></p> <p>16 <b>Q. Uh-huh.</b></p> <p>17 <b>A. And if the call occurs in your beat,</b></p> <p>18 <b>you are therefore deemed case officer.</b></p> <p>19 <b>Q. Okay. And so it's -- I mean, why do</b></p> <p>20 <b>you think only a case officer can request a wanted</b></p> <p>21 <b>entry?</b></p> <p>22 <b>A. Because they're the most familiar with</b></p> <p>23 <b>the case.</b></p> <p>24 <b>Q. Makes sense to me.</b></p> <p>25 <b>I guess if you look down a little bit</b></p>	<p>1 <b>BY MR. HAMILTON:</b></p> <p>2 <b>Q. I can rephrase if that's unclear.</b></p> <p>3 <b>A. Please.</b></p> <p>4 <b>Q. In the middle of that -- of section C,</b></p> <p>5 <b>there's language that says "The case officer will be</b></p> <p>6 <b>notified and is responsible for the suspect being</b></p> <p>7 <b>picked up and/or interviewed."</b></p> <p>8 <b>Why do you think it is the case</b></p> <p>9 <b>officer's responsibility to be responsible for</b></p> <p>10 <b>pickup and the interview of the suspect?</b></p> <p>11 <b>A. Familiarity and delegating</b></p> <p>12 <b>responsibilities.</b></p> <p>13 <b>Q. Why wouldn't another officer conduct an</b></p> <p>14 <b>interview?</b></p> <p>15 <b>A. Not always the case, but like I said,</b></p> <p>16 <b>familiarity with -- with the facts that are going</b></p> <p>17 <b>on.</b></p> <p>18 <b>Q. Got it. Okay.</b></p> <p>19 <b>So I am now going to show you a</b></p> <p>20 <b>document that is marked with Bates -- it's just the</b></p> <p>21 <b>next one -- with Bates DEFRFP234000017. We're going</b></p> <p>22 <b>to mark this as Walsh Exhibit 4.</b></p> <p>23 <b>(Exhibit 4 was marked for</b></p> <p>24 <b>identification.)</b></p> <p>25 <b>BY MR. HAMILTON:</b></p>

26 (Pages 101 to 104)



KEVIN WALSH 2/9/2017

Page 105	Page 107
<p>1 Q. Here you go.</p> <p>2 And you'll see at the top -- well,</p> <p>3 first of all, are you familiar with this document?</p> <p>4 A. Yes.</p> <p>5 Q. You'll see at the top it reads</p> <p>6 "Department" -- "Departmental General Order 1526."</p> <p>7 Would you agree with me that this is</p> <p>8 the order that followed Exhibit 3 that we just</p> <p>9 discussed?</p> <p>10 A. Yes.</p> <p>11 Q. If you'll turn to the next page, you'll</p> <p>12 see once more that there's section B. And this is</p> <p>13 closer to the middle of the page. Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. The title now reads "Wanted, warrants,</p> <p>16 stop orders." What is a stop order?</p> <p>17 A. Based off of probable cause, the case</p> <p>18 officer has reason to believe that the person --</p> <p>19 person or persons could potentially flee to whether</p> <p>20 it be adjoining counties or across state lines.</p> <p>21 That officer contacts supervisor and the supervisor</p> <p>22 determines as well that all of the facts presented</p> <p>23 to him or her, that a stop order should be issued</p> <p>24 based on that person potentially fleeing.</p> <p>25 Q. So is it fair to say that a stop order</p>	<p>1 A. Yes.</p> <p>2 Q. Let me rephrase.</p> <p>3 But I'll -- I'll just rephrase just for</p> <p>4 the benefit -- when a new general -- in your</p> <p>5 experience as a police officer, when you have new</p> <p>6 general orders that cancel older orders, is there</p> <p>7 some sort of discussion about the amendments that</p> <p>8 are made?</p> <p>9 A. No.</p> <p>10 Q. And how -- how does the department</p> <p>11 ensure that police officers have read the new</p> <p>12 general orders that come out?</p> <p>13 A. Officers go into the past system and</p> <p>14 reading the general order at the bottom, they put in</p> <p>15 their user name and password specific to them</p> <p>16 showing that they have read the general order.</p> <p>17 Q. Is this -- this is a little technical,</p> <p>18 but is it one of those things where you can scroll</p> <p>19 down to the bottom and just put your password in, or</p> <p>20 are there certain checkpoints that you have to --</p> <p>21 to -- to pass to show that you've read it?</p> <p>22 A. There -- there are tests on some. Not</p> <p>23 all but some.</p> <p>24 Q. When are those tests administered?</p> <p>25 A. I don't know the -- the rhyme or</p>
Page 106	Page 108
<p>1 is a type of wanted?</p> <p>2 A. Type, yes.</p> <p>3 Q. Now, subsection A contains bold</p> <p>4 language. Would you -- if you don't mind -- if you</p> <p>5 don't mind opening up Exhibit 3 just for comparison.</p> <p>6 Would you agree with me that the language in</p> <p>7 subsection A of Exhibit 4 is not contained in</p> <p>8 Exhibit 3?</p> <p>9 A. Yes.</p> <p>10 Q. And so I'm going to read that new</p> <p>11 language, and just let me know if it's correct.</p> <p>12 It says, "Once the case officer has</p> <p>13 determined probable cause exists that a person has</p> <p>14 committed a crime, only the case officer shall</p> <p>15 request wanted person entries. The case officer</p> <p>16 will contact CARE or DCI word processing in</p> <p>17 requesting a wanted entry on the person."</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall why this language was</p> <p>21 added to the general order?</p> <p>22 A. No.</p> <p>23 Q. Is it your recollection that when new</p> <p>24 general orders come out, the -- the new additional</p> <p>25 language is -- is discussed explicitly?</p>	<p>1 reason.</p> <p>2 Q. But are you aware of any schedule that</p> <p>3 says, you know, we're conducting a test on General</p> <p>4 Order 15-26?</p> <p>5 A. No.</p> <p>6 Q. Is -- what happens if you don't pass</p> <p>7 that test?</p> <p>8 A. You take it again.</p> <p>9 Q. Okay. Are there any other consequences</p> <p>10 that you're aware of?</p> <p>11 A. Not that I'm aware of.</p> <p>12 Q. Are you -- have you ever not passed one</p> <p>13 of those tests?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. Do you know if officers are informed if</p> <p>16 they have not passed the test?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you know that you have passed all of</p> <p>19 these tests?</p> <p>20 A. I do.</p> <p>21 Q. Okay. How were you informed that you</p> <p>22 passed the test?</p> <p>23 A. It's -- it's just a test at the bottom.</p> <p>24 It might be five questions, might be 50 questions.</p> <p>25 And I've never been denied.</p>

27 (Pages 105 to 108)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 109</p> <p>1       <b>Q. Okay. So there's some sort of screen</b> 2 <b>or some sort of indication that you remember that</b> 3 <b>says --</b> 4       A. It's -- it's on the specific general 5 order. There's nothing that goes out that says you 6 need to log on and take this test. It is specific 7 to that general order at the very bottom. 8       <b>Q. Uh-huh.</b> 9       A. Not all of them have it. Some of them 10 do. 11       <b>Q. Got it. Got it. Okay.</b> 12       Why was this -- why do you think that 13 the language of probable cause existing appears in 14 this General Order 15-26 but did not appear in 15 11-26? 16       MR. HUGHES: Just object to the form of 17 the question. You're asking him to speculate. So 18 it calls for speculation and conjecture on his part. 19 And it could also be interpreted as being 20 argumentative. 21       You can still answer if he -- 22       THE WITNESS: I don't know. 23       BY MR. HAMILTON: 24       <b>Q. Okay. But it's your understanding that</b> 25 <b>probable cause has always been a part of the</b></p>	<p style="text-align: right;">Page 111</p> <p>1       check, but will you agree with me that the bold 2 language that appears under section B, subsection 3 little A, is the new language that's been included? 4       A. Yes. 5       <b>Q. So I'm going to read that bold</b> 6 <b>language. I'll read the entire thing, actually,</b> 7 <b>just -- and please confirm if I've read it</b> 8 <b>correctly. It says, "Once the case officer has</b> 9 <b>determined probable cause exists that a person has</b> 10 <b>committed a crime, they must have a review of the</b> 11 <b>facts supporting the case by their immediate</b> 12 <b>supervisor of his or her designee and receive</b> 13 <b>approval before questioning wanted person" --</b> 14       MR. HUGHES: Before "requesting." I 15 think you used the word "question" instead of -- I 16 think you said "questioning" instead of -- I think 17 you said "questioning" instead of "requesting." 18       MR. HAMILTON: Thank you. Thank you. 19       MR. HUGHES: I think you misread it. 20       MR. HAMILTON: I think you're -- 21       MR. HUGHES: I think it was honest -- 22       MR. HAMILTON: You're absolutely right, 23 Mike. Let me start over. 24       <b>Q. "Once the case officer has determined</b> 25 <b>probable cause exists that a person has committed a</b></p>
<p style="text-align: right;">Page 110</p> <p>1       <b>requirement for issuing a wanted; is that correct?</b> 2       A. Yes. 3       <b>Q. Okay. You can close that.</b> 4       One more on this, if you'll indulge me. 5       This is the last one. 6       So I'm now referring to a document with 7 Bates DEFRFP234000022. And it's going to be marked 8 as Walsh Exhibit 5. 9       (Exhibit 5 was marked for 10 identification.) 11       BY MR. HAMILTON: 12       <b>Q. And Detective Walsh, will you agree</b> 13 <b>with me that this is Department General Order 16-26?</b> 14       A. Yes. 15       <b>Q. And that this replaces what was marked</b> 16 <b>as Exhibit 4 which was Department General Order</b> 17 <b>15-26?</b> 18       A. Yes. 19       <b>Q. And to your knowledge, is this a</b> 20 <b>department general order that is currently in</b> 21 <b>effect?</b> 22       A. Yes. 23       <b>Q. Great.</b> 24       Let's turn to the next page, to 25 section B. And I'll give you an opportunity to</p>	<p style="text-align: right;">Page 112</p> <p>1       <b>crime, they must have a review of the facts</b> 2 <b>supporting the case by their immediate supervisor or</b> 3 <b>his/her designee and receive approval before</b> 4 <b>requesting wanted person entries. Once approved,</b> 5 <b>the case officer will contact CARE or DCI word</b> 6 <b>processing and request a wanted entry on the person.</b> 7 <b>The name and the DSN of the approving supervisor</b> 8 <b>must be in the narrative of the CARE report."</b> 9       Did I read that accurately? 10       A. Yes. 11       <b>Q. Thank you.</b> 12       Now, looking at this bold language, it 13 says, and correct me if I'm wrong, that the case 14 officer must receive approval before requesting a 15 wanted person entry -- 16       A. Yes. 17       <b>Q. -- is that correct?</b> 18       Did that conflict at all with the 19 practice that you're aware of of commencing 20 initiating a wanted and then having a conversation 21 with a supervising officer? 22       A. Could you clarify, please? 23       <b>Q. Sure.</b> 24       Do you understand this paragraph to 25 mean that before an officer can request a wanted</p>

28 (Pages 109 to 112)



KEVIN WALSH 2/9/2017

<p>Page 113</p> <p>1 person entry, they must receive approval?</p> <p>2 A. Yes.</p> <p>3 Q. And am I correct that in our discussion</p> <p>4 previously, you talked about being on the scene and</p> <p>5 the decision to issue a wanted. You described two</p> <p>6 scenarios. One scenario was that you have a</p> <p>7 supervising officer with you. You talk through the</p> <p>8 case, and then you commence the wanted.</p> <p>9 In another scenario, you make a</p> <p>10 probable cause determination, you put it into -- you</p> <p>11 contact CARE, and then after that, you speak with a</p> <p>12 supervising officer; is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Based on your understanding and your</p> <p>15 reading of this paragraph, is that following the</p> <p>16 protocol as laid out here?</p> <p>17 A. Not the new, no.</p> <p>18 Q. Not the new --</p> <p>19 A. The new wording.</p> <p>20 Q. Not the new wording?</p> <p>21 A. No.</p> <p>22 Q. So it's correct that before -- based on</p> <p>23 your reading, based on this current language, an</p> <p>24 officer must receive approval from the supervising</p> <p>25 officer before they create the wanted?</p>	<p>Page 115</p> <p>1 the sake of everybody being on the same page, direct</p> <p>2 your attention to documents that have been marked</p> <p>3 DEFRFP1000014 which I am now marking as Exhibit 6.</p> <p>4 (Exhibit 6 was marked for</p> <p>5 identification.)</p> <p>6 BY MR. HAMILTON:</p> <p>7 Q. Walsh Exhibit 6. This is for you.</p> <p>8 Mr. Hughes, this copy is for you.</p> <p>9 Detective Walsh, do you recognize this</p> <p>10 document?</p> <p>11 A. I do.</p> <p>12 Q. What is it?</p> <p>13 A. It's an official St. Louis County</p> <p>14 police report.</p> <p>15 Q. Great.</p> <p>16 Because I don't operate in this system</p> <p>17 that you guys work in, I'm going to ask that you</p> <p>18 walk through this document in a little bit of</p> <p>19 detail. But let's start with the morning of</p> <p>20 January 25th, 2016 if you can remember.</p> <p>21 So if I'm going back -- going back to</p> <p>22 our timeline, you have just -- you have somewhat</p> <p>23 recently graduated from your probationary period; is</p> <p>24 that correct?</p> <p>25 A. Full year ago so this is two years.</p>
<p>Page 114</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Let's close this. Just give me</p> <p>3 one second.</p> <p>4 If you-all don't mind, let's do this</p> <p>5 because I know we've got -- we've got a -- got a</p> <p>6 time crunch here. I -- I see about --</p> <p>7 MR. HOLLAND: Let's go off the record</p> <p>8 for a minute.</p> <p>9 THE VIDEOGRAPHER: The time is 11:59.</p> <p>10 We are off the record.</p> <p>11 (Recess taken.)</p> <p>12 THE VIDEOGRAPHER: The time is 12:09.</p> <p>13 We are back on the record.</p> <p>14 BY MR. HAMILTON:</p> <p>15 Q. Thank you very much.</p> <p>16 So we had just been talking about</p> <p>17 various general orders in the St. Louis County</p> <p>18 Police Department. And let's move on, actually,</p> <p>19 to the events that gave rise to this complaint.</p> <p>20 So I'm going to ask you to walk through</p> <p>21 the events that led up to the issuance of the wanted</p> <p>22 for Mr. Furlow in January of 2016. Are you familiar</p> <p>23 with those events?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. I'm actually going to, just for</p>	<p>Page 116</p> <p>1 Q. Oh, two years, right. Because you did</p> <p>2 the Academy -- I'm sorry. I'm just doing this for</p> <p>3 myself. You did the Academy second half of 2013,</p> <p>4 and then 2014 to 2015 you were a probationary</p> <p>5 officer, right?</p> <p>6 A. Uh-huh.</p> <p>7 Q. So is it correct that the beginning of</p> <p>8 2016 you've now been -- I see what you're saying.</p> <p>9 You've been an officer for a full year, but you are</p> <p>10 now no longer a probationary officer; is that</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Tell me what -- based on your</p> <p>14 recollection, what does your sort of day look like</p> <p>15 around this time?</p> <p>16 A. I was on afternoon shift, so I started</p> <p>17 my day at 10:30.</p> <p>18 Q. Okay. And in what precinct were you</p> <p>19 based at this time?</p> <p>20 A. North County First Precinct.</p> <p>21 Q. And you received a call about an</p> <p>22 alleged assault?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Talk to me about what you recall</p> <p>25 of that call.</p>

29 (Pages 113 to 116)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 117

1 A. I was -- I had just cleared from  
2 another call. I don't know what call that was. But  
3 Officer Ziegler responded there. He arrived before  
4 me because I was coming from -- a ways from my last  
5 call. And St. Louis County Dispatch advised that a  
6 female -- it was a domestic violence call, and a  
7 female neighbor had made a call saying that her  
8 neighbor was just assaulted by her husband and that  
9 the victim was on-scene and was very flustered,  
10 nervous, upset.  
11 **Q. Who is Officer Ziegler?**  
12 A. He's another patrol officer in the  
13 North County precinct.  
14 **Q. Is he -- in terms of years on the**  
15 **force, is he senior to you? Junior to you?**  
16 A. Junior.  
17 **Q. Junior.**  
18 **And as you indicated, he was closer and**  
19 **he was the first officer to report on the scene?**  
20 A. Yes.  
21 **Q. About how far away were you coming**  
22 **from?**  
23 A. I know it was a ways. I don't remember  
24 specifically where I was.  
25 **Q. Why did the call come in to you?**

Page 118

1 A. It was my beat.  
2 **Q. It was your beat?**  
3 A. Uh-huh.  
4 **Q. Okay. And so about -- it looks like --**  
5 **and I'm just going to start walking through the**  
6 **document. If you look sort of on the left-hand side**  
7 **towards the top where it says "CAD details"?**  
8 A. Yes.  
9 **Q. It says "Date/time received," it looks**  
10 **like that's 12:25 on Monday; is that right?**  
11 A. Uh-huh.  
12 **Q. So is that shortly after the beginning**  
13 **of your shift?**  
14 MR. HUGHES: 1/25 on Monday, just so  
15 we --  
16 MR. HOLLAND: The time, not the date.  
17 MR. HUGHES: Oh, I'm sorry, I'm sorry.  
18 I apologize.  
19 THE WITNESS: Roughly two hours after.  
20 BY MR. HAMILTON:  
21 **Q. Okay. And so -- and the address that**  
22 **is listed here right under "Respond Location" is**  
23 **██████████; is that correct?**  
24 A. Yes.  
25 **Q. Were you familiar at this -- with this**

Page 119

1 **address before the call came in?**  
2 A. No.  
3 **Q. Okay. So did you know any of the**  
4 **individuals involved before arriving on the scene?**  
5 A. No.  
6 **Q. Okay. So talk to me about sort of what**  
7 **happened when you arrived on the scene.**  
8 A. I arrived on-scene and responded to  
9 ██████████ where I was approached by the victim,  
10 Mrs. Furlow. And Mrs. Furlow walked me through what  
11 had just taken place.  
12 **Q. If you don't mind, let's -- let's turn**  
13 **two pages to what looks to be the narrative. Is**  
14 **this the -- does this narrative capture what you --**  
15 **what you saw when you arrived on the scene?**  
16 A. Yes.  
17 **Q. Okay. So you can -- you can keep**  
18 **going. So you spoke to the victim. And what did**  
19 **she say?**  
20 A. She said that her husband, Dwayne, came  
21 home, accused her of being unfaithful in their  
22 marriage. He smacked her, knocked her to the  
23 ground, stomped on her leg several times, tried  
24 dragging her out of the house by her hair. And when  
25 she got to the doorway, she was able to get up

Page 120

1 and -- and flee the area.  
2 **Q. And -- and so -- and she recounted**  
3 **that -- that to you. What -- what happened next?**  
4 A. While we were on-scene, she said that  
5 he did leave, but was nervous about being in her  
6 house alone. I said that while we were on-scene, I  
7 said, "I'm not going to leave you in the house  
8 alone."  
9 I said, "I'm going to take a protective  
10 sweep around the outside and the inside to make sure  
11 that he didn't double back and come in the back  
12 door," to which she agreed and said that it was a  
13 good idea to make sure that he wasn't in there  
14 waiting for her.  
15 **Q. Right.**  
16 A. And while I did a protective sweep of  
17 the residence, I observed a loaded AR15 in the  
18 basement. I asked her about that, being that it was  
19 a domestic violence issue. She had told me that  
20 Dwayne was on probation for burglary and that she  
21 had purchased the gun for their protection because  
22 he was on probation.  
23 **Q. Uh-huh.**  
24 A. After rendering that the firearm  
25 records check showed that the firearm was not

30 (Pages 117 to 120)

KEVIN WALSH 2/9/2017

Page 121	Page 123
<p>1 stolen, she stated that that firearm belonged to</p> <p>2 her.</p> <p>3 I rendered it safe, placed it in her</p> <p>4 vehicle as she told me that she was going to a</p> <p>5 family member in St. Louis City. When she began</p> <p>6 sort of packing her items, she had several large</p> <p>7 clothing tubs, plastic tubs that she was trying to</p> <p>8 move. I moved probably, I don't know, two, three of</p> <p>9 them --</p> <p>10 <b>Q. Uh-huh.</b></p> <p>11 A. -- to the back of her car. And she</p> <p>12 said that she was pressing charges and she was done</p> <p>13 with -- with Mr. Furlow.</p> <p>14 <b>Q. Okay. And at any point in time during</b></p> <p>15 <b>the point in which you were interviewing Ms. Furlow</b></p> <p>16 <b>or at the residence, did you speak to Mr. Furlow?</b></p> <p>17 A. I did.</p> <p>18 <b>Q. How did that come to pass?</b></p> <p>19 A. Her phone rang multiple times, and she</p> <p>20 seemed to be -- originally I didn't know who was on</p> <p>21 the other end. She just kept ignoring them. And</p> <p>22 finally she showed me her phone and said, "It's</p> <p>23 him."</p> <p>24 And I said, "Well, let me talk to him."</p> <p>25 I picked up the phone. The subject on</p>	<p>1 <b>Q. What steps did you take to do that?</b></p> <p>2 A. After securing Mrs. Furlow in her</p> <p>3 vehicle and making sure that the residence was</p> <p>4 secure, I responded back to my patrol car, and I</p> <p>5 believe at that time I contacted CARE.</p> <p>6 <b>Q. And did you contact CARE in the way</b></p> <p>7 <b>that -- that we had discussed previously? You</b></p> <p>8 <b>called them up, and you described the individual for</b></p> <p>9 <b>whom you wanted a wanted placed?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. Okay. Did you consult with anybody</b></p> <p>12 <b>before placing that call?</b></p> <p>13 A. No.</p> <p>14 <b>Q. Did you consult with anybody after</b></p> <p>15 <b>placing that call?</b></p> <p>16 A. Not to my knowledge, no.</p> <p>17 <b>Q. What is the standard practice in your</b></p> <p>18 <b>experience when someone speaks to you over the</b></p> <p>19 <b>phone -- strike that.</b></p> <p>20 <b>What is the standard practice when</b></p> <p>21 <b>somebody who you suspect may be involved in a crime</b></p> <p>22 <b>speaks to you over the phone and informs you that</b></p> <p>23 <b>they have legal counsel?</b></p> <p>24 A. I'm not sure of your question. I'm</p> <p>25 sorry, could you rephrase?</p>
Page 122	Page 124
<p>1 the other end identified himself as Dwayne Furlow.</p> <p>2 And I advised the subject on the other end that if</p> <p>3 he was, in fact, Mr. Furlow, that he needed to</p> <p>4 respond back to the scene.</p> <p>5 The subject on the other end told me</p> <p>6 that he's already contacted his lawyers, that I was</p> <p>7 going to lock him up, and that he was not going to</p> <p>8 turn himself in.</p> <p>9 I informed Mr. Furlow that yes, he</p> <p>10 would be under arrest and that if he did not respond</p> <p>11 to the scene that a wanted would be placed out for</p> <p>12 his arrest based on the probable cause that I've</p> <p>13 determined, and that he would be picked up probably</p> <p>14 at an inconvenient time in his life rather than</p> <p>15 handling it right then and there.</p> <p>16 <b>Q. So at what point in time sort of in --</b></p> <p>17 <b>well, so that conversation ended and what happened</b></p> <p>18 <b>next?</b></p> <p>19 A. Mr. Furlow said he would not turn</p> <p>20 himself in, shouted some expletives on the phone and</p> <p>21 hung up.</p> <p>22 <b>Q. And was it at this point in time that</b></p> <p>23 <b>you made a determination that a wanted was -- that</b></p> <p>24 <b>you would issue a wanted?</b></p> <p>25 A. Yes.</p>	<p>1 <b>Q. Sure.</b></p> <p>2 <b>No, it's probably terribly phrased.</b></p> <p>3 <b>What -- what steps do you take -- did</b></p> <p>4 <b>you have any reason to believe that the person on</b></p> <p>5 <b>the other end of the phone that you were speaking to</b></p> <p>6 <b>was not Mr. Furlow?</b></p> <p>7 A. No.</p> <p>8 <b>Q. What -- what -- what context clues or</b></p> <p>9 <b>factors did you take into account in making a</b></p> <p>10 <b>determination that you were actually talking to</b></p> <p>11 <b>Mr. Furlow over the phone?</b></p> <p>12 A. The -- the phone call came in to</p> <p>13 Mrs. Furlow's phone. She recognized it as being --</p> <p>14 I'm not sure what she had him saved in her phone as.</p> <p>15 She originally picked up. There was shouting back</p> <p>16 and forth real quick. She acknowledged that it was</p> <p>17 him, at which time I took -- took possession of the</p> <p>18 phone and -- and talked to Mr. Furlow.</p> <p>19 <b>Q. And so based on -- based on what you</b></p> <p>20 <b>described, did you have any reason to believe that</b></p> <p>21 <b>you were speaking to somebody who was not</b></p> <p>22 <b>Mr. Furlow?</b></p> <p>23 A. No.</p> <p>24 <b>Q. So why, then, did you end up issuing a</b></p> <p>25 <b>wanted if you knew that the person that you were</b></p>

31 (Pages 121 to 124)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 125</p> <p>1 speaking to over the phone was Mr. Furlow and he</p> <p>2 explained that he would not -- he would not speak to</p> <p>3 you?</p> <p>4 A. Because there was probable cause for</p> <p>5 the arrest for domestic violence and domestic peace</p> <p>6 disturbance.</p> <p>7 Q. Why wouldn't you then apply for a</p> <p>8 warrant?</p> <p>9 A. The -- I -- I would say it's more of --</p> <p>10 sorry, I'm having a little bit of a brain cramp.</p> <p>11 Q. No worries.</p> <p>12 A. That is following the general procedure</p> <p>13 of -- of domestics and what is laid out through the</p> <p>14 Prosecuting Attorney's Office, the formal</p> <p>15 interview would be -- should be attempted. I</p> <p>16 followed those guidelines.</p> <p>17 Q. So even though, as -- as you've said,</p> <p>18 that the purpose of issuing a wanted is to be able</p> <p>19 to conduct a formal interview where you speak to</p> <p>20 somebody, you issued a warrant -- excuse me -- you</p> <p>21 issued a wanted?</p> <p>22 A. Yes.</p> <p>23 Q. Did you believe that in issuing a</p> <p>24 wanted, you would be able to obtain any additional</p> <p>25 information in talking to Mr. Furlow?</p>	<p style="text-align: right;">Page 127</p> <p>1 A. Not necessarily, no.</p> <p>2 Q. Okay. Is it common practice that even</p> <p>3 if a person comes -- comes back to the scene to give</p> <p>4 their side of the story that they're going to be</p> <p>5 arrested?</p> <p>6 A. No.</p> <p>7 Q. So there are instances in which perhaps</p> <p>8 a different type of crime or incident where you</p> <p>9 would speak to somebody on the phone and say, you</p> <p>10 know, come back to the scene and talk to me and they</p> <p>11 might not be -- end up being arrested?</p> <p>12 A. Correct.</p> <p>13 Q. So I started on this question before</p> <p>14 and I'm going to return to it. It's -- and I</p> <p>15 apologize if you answer it again. I just don't</p> <p>16 recall.</p> <p>17 What is the standard practice when</p> <p>18 somebody informs you over the phone that they've got</p> <p>19 legal counsel and that they are not interested in</p> <p>20 speaking to you?</p> <p>21 A. I -- I wouldn't necessarily say there</p> <p>22 is a standard of practice. Mr. Furlow just said,</p> <p>23 "I'm not returning to the scene. I contacted my</p> <p>24 lawyer and he told me not to turn myself in."</p> <p>25 Q. Did you make any attempt to determine</p>
<p style="text-align: right;">Page 126</p> <p>1 A. I always try and present it, you know,</p> <p>2 to a suspect that, you know, this is their time to</p> <p>3 give me their side of the story. Whether they</p> <p>4 choose to or not, that's up to them. But I'm at</p> <p>5 least going to give them the opportunity to give</p> <p>6 their side.</p> <p>7 Q. If Mr. Furlow had -- had come in and</p> <p>8 spoken to you, what would that result -- what would</p> <p>9 the result have been?</p> <p>10 A. His -- his statement, whatever he had</p> <p>11 to say or not say, would have been entered into the</p> <p>12 police report, and he would have been taken into</p> <p>13 custody based off of the facts that I was given</p> <p>14 on-scene by Mrs. Furlow.</p> <p>15 Q. So either way, Mr. Furlow was going to</p> <p>16 be arrested; is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. Is this -- is sort of this process that</p> <p>19 you described that he would have been arrested</p> <p>20 either way, is this particular to domestic violence</p> <p>21 cases, or is this just the protocol that, you know,</p> <p>22 if -- if there's probable -- strike that.</p> <p>23 Is this -- is what -- is the process</p> <p>24 that you've described specific to domestic violence</p> <p>25 cases?</p>	<p style="text-align: right;">Page 128</p> <p>1 who Mr. Furlow's lawyer was at the time?</p> <p>2 A. No.</p> <p>3 Q. Did you have any reason to question</p> <p>4 Ms. -- Ms. Furlow's account of what happened at the</p> <p>5 time?</p> <p>6 A. Question? I'm sorry?</p> <p>7 Q. Her account of the events that she</p> <p>8 described that appear in your narrative?</p> <p>9 A. Could you elaborate, please?</p> <p>10 Q. Sure, yeah.</p> <p>11 Did you -- yeah, as the reporting</p> <p>12 officer, did you have any reason to think that the</p> <p>13 account that Ms. Furlow was giving was not sort of a</p> <p>14 complete or truthful account?</p> <p>15 A. No. I had no indication of that.</p> <p>16 Q. Okay. You have in your report that</p> <p>17 you -- let me be a little bit more specific here.</p> <p>18 So on -- if you look at your narrative, the second</p> <p>19 page, toward the top it is written, "I observed no</p> <p>20 bruises, swelling, or lacerations to Latoya F.'s</p> <p>21 person. Latoya F. refused medical attention on the</p> <p>22 scene."</p> <p>23 So do I understand correctly that in --</p> <p>24 in looking at Ms. Furlow, you didn't see any sort</p> <p>25 of -- any indication of -- any sign of injury?</p>

32 (Pages 125 to 128)

KEVIN WALSH 2/9/2017

Page 129	Page 131
<p>1 A. No sign of injury.</p> <p>2 <b>Q. On what was your probable cause based</b></p> <p>3 <b>on?</b></p> <p>4 A. It was based on all of her statements</p> <p>5 that she provided.</p> <p>6 <b>Q. So probable cause determination can be</b></p> <p>7 <b>made by someone stating that I've -- I've been the</b></p> <p>8 <b>victim of a crime and this is the person who did it.</b></p> <p>9 <b>Is that sufficient for probable cause?</b></p> <p>10 A. Based on her statements, her</p> <p>11 interaction with me, her state of -- her demeanor</p> <p>12 on-scene, based on all of those, yes.</p> <p>13 <b>Q. Did you make any determination that</b></p> <p>14 <b>Ms. Furlow was of sound mind?</b></p> <p>15 A. Just by our interaction. I had no</p> <p>16 indication that she would not be.</p> <p>17 <b>Q. So just to be clear, the -- the</b></p> <p>18 <b>entirety of your probable cause determination was in</b></p> <p>19 <b>speaking to Ms. Furlow and sort of observing her</b></p> <p>20 <b>general state of being?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. But you did not observe any sort of</b></p> <p>23 <b>physical signs of sort of the incident that she</b></p> <p>24 <b>recounted to you; is that right?</b></p> <p>25 A. Nothing physical injury-wise. Hair was</p>	<p>1 <b>Q. So -- so even though -- and I'm just --</b></p> <p>2 <b>correct me if I'm wrong. Even though both a warrant</b></p> <p>3 <b>and a wanted have the same requirements of probable</b></p> <p>4 <b>cause, the probable cause that you had established</b></p> <p>5 <b>was sufficient for a wanted but was not sufficient</b></p> <p>6 <b>for a warrant in your determination?</b></p> <p>7 A. No. I would say they're both --</p> <p>8 they're both -- in my determination they're both</p> <p>9 sufficient. But it's -- it's the powers above me</p> <p>10 that I have nothing to do with that would</p> <p>11 necessarily, I guess, entertain.</p> <p>12 <b>Q. Your experience told you that you</b></p> <p>13 <b>didn't have enough information based on your</b></p> <p>14 <b>interview of Ms. Furlow and your conversation with</b></p> <p>15 <b>Mr. Furlow for a successful warrant application; is</b></p> <p>16 <b>that correct?</b></p> <p>17 MR. HUGHES: Just object to the form of</p> <p>18 the question. It misstates his testimony, I</p> <p>19 believe. But go ahead.</p> <p>20 BY MR. HAMILTON:</p> <p>21 <b>Q. Please correct me if I'm wrong. I can</b></p> <p>22 <b>restate it or I can say it again if that's helpful.</b></p> <p>23 A. No. Based -- based on experience, I --</p> <p>24 I -- I have enough for both. But like I said,</p> <p>25 that's above me. I -- I have enough. I would -- I</p>
Page 130	Page 132
<p>1 disheveled. Clothes were kind of ruffled.</p> <p>2 <b>Q. Okay.</b></p> <p>3 A. But nothing physical on her person,</p> <p>4 per se.</p> <p>5 <b>Q. Okay. Just to be clear, did you</b></p> <p>6 <b>attempt to find out who Mr. Furlow's lawyer was that</b></p> <p>7 <b>he referenced in your phone call?</b></p> <p>8 A. No.</p> <p>9 <b>Q. Are you aware of any other teletypes</b></p> <p>10 <b>that you can use to get in touch with a person that</b></p> <p>11 <b>you are seeking?</b></p> <p>12 A. No.</p> <p>13 <b>Q. So is it your understanding that the</b></p> <p>14 <b>only way that you could have followed up to have a</b></p> <p>15 <b>formal interview with Mr. Furlow was through the</b></p> <p>16 <b>issuance of a wanted?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. And that you -- but you didn't have the</b></p> <p>19 <b>information sufficient for the application of a</b></p> <p>20 <b>warrant at that time; is that correct?</b></p> <p>21 A. No, it's not.</p> <p>22 <b>Q. So you could have applied for a warrant</b></p> <p>23 <b>at that time; is that correct?</b></p> <p>24 A. I could. But based off of no formal</p> <p>25 interview, I likely wouldn't be entertained.</p>	<p>1 would feel comfortable going and applying for a</p> <p>2 warrant with what I had.</p> <p>3 <b>Q. But you didn't because --</b></p> <p>4 A. Because the prosecutor wants a formal</p> <p>5 interview or an attempt at a formal interview.</p> <p>6 <b>Q. Okay. Did you believe that Mr. Furlow</b></p> <p>7 <b>would return home eventually?</b></p> <p>8 A. Likelihood, yes.</p> <p>9 <b>Q. Did you attempt to follow up with</b></p> <p>10 <b>Mr. Furlow sort of at his home?</b></p> <p>11 A. I did.</p> <p>12 <b>Q. And with what result?</b></p> <p>13 A. Negative results.</p> <p>14 <b>Q. At what point in time did you attempt</b></p> <p>15 <b>such follow up?</b></p> <p>16 A. Later that night, the next day, and I'm</p> <p>17 not sure if it was three days in a row --</p> <p>18 <b>Q. Sure.</b></p> <p>19 A. -- but I know it was several times.</p> <p>20 <b>Q. Did you believe that Mr. Furlow</b></p> <p>21 <b>presented a -- a threat to Ms. Furlow?</b></p> <p>22 A. From her account and her demeanor</p> <p>23 on-scene, yes, I did.</p> <p>24 <b>Q. But despite this, it's your experience</b></p> <p>25 <b>that those factors and circumstances would not be --</b></p>

33 (Pages 129 to 132)



KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 133</p> <p>1 would probably result in a warrant application being 2 denied; is that correct? 3 A. Well, I mean, the wanted was placed out 4 for his arrest. 5 <b>Q. Right.</b> 6 A. Which the warrant would have done the 7 same -- 8 <b>Q. Right.</b> 9 A. -- for his arrest. 10 <b>Q. Right.</b> 11 A. So could you kind of rephrase the 12 question, please? 13 <b>Q. Sure.</b> 14 I -- yeah, I guess I'm -- what I'm 15 trying to figure out, and -- and this may be ground 16 that we've already covered, is -- is your 17 determination if -- if he still presented a danger 18 to Ms. Furlow and you thought he was going to come 19 back home, why you ultimately didn't -- with the 20 information that you had, ultimately didn't apply 21 for a warrant. That's what I'm trying to figure 22 out. 23 A. The wanted was -- I was following my -- 24 my standard of practice as well, that I would try 25 and get his side of the story of what's going on,</p>	<p style="text-align: right;">Page 135</p> <p>1 exactly 24 hours later. Do you recall having a 2 conversation with -- would it be Sergeant Rose? 3 A. Yes. I did not have a -- 4 <b>Q. A conversation?</b> 5 A. -- a conversation, no, not to my 6 recollection. 7 <b>Q. Okay. So that was -- that was approved</b> 8 <b>the next day.</b> 9 <b>And then there's a final approval that</b> 10 <b>happened a few days later by -- is that Sergeant</b> 11 <b>Eilermann?</b> 12 A. No. She's a civilian employee. 13 <b>Q. Okay. What -- can you just explain</b> 14 <b>that process?</b> 15 A. She's a CARE operator. 16 <b>Q. I see.</b> 17 A. She's a supervisor in the CARE 18 department. 19 <b>Q. And so CARE gives the final approval?</b> 20 A. On the report itself. Yes. 21 <b>Q. Got it.</b> 22 <b>Are -- have there ever been instances</b> 23 <b>in which the CARE provider has not provided final</b> 24 <b>approval?</b> 25 A. Not to my knowledge, no.</p>
<p style="text-align: right;">Page 134</p> <p>1 whether he wants to tell me his side or not, but get 2 everything together so I can present it to the 3 prosecutor and say, this is what we have. 4 <b>Q. Got it.</b> 5 A. So there would be no more question of, 6 well, Did you interview him? You didn't interview 7 him? What did he have to say? 8 <b>Q. Got it, okay.</b> 9 <b>You made a reference to the powers that</b> 10 <b>be. And just to be clear, is it your understanding</b> 11 <b>that they -- do you think they use a different</b> 12 <b>standard for probable cause?</b> 13 A. No. 14 <b>Q. They just want to see an interview, a</b> 15 <b>formal interview of the suspect?</b> 16 A. Yes. 17 <b>Q. Okay. So the wanted's in the system.</b> 18 <b>This -- this has happened on -- on the 25th of</b> 19 <b>January. To go back to -- to the front page, if you</b> 20 <b>don't mind, under "Management" toward the bottom, it</b> 21 <b>says "date/time entered," it looks like you entered</b> 22 <b>it on -- at 1:26.</b> 23 <b>And then if you take a look below, it</b> 24 <b>says "Approval records." Supervisor review</b> 25 <b>happened, it looks like, the next day, almost</b></p>	<p style="text-align: right;">Page 136</p> <p>1 <b>Q. Okay. So that was approved on</b> 2 <b>January 29th, that final approval was achieved on --</b> 3 <b>on the 29th. So let's flip a couple more pages</b> 4 <b>to -- now, this is page 5 of 7 if you look in the</b> 5 <b>bottom right-hand corner. So this is the instance</b> 6 <b>in which Mr. Furlow was ultimately arrested. Do you</b> 7 <b>recall receiving a -- a call from the officer who</b> 8 <b>arrested Mr. Furlow?</b> 9 A. Yes. 10 <b>Q. Tell me about that call.</b> 11 A. The officer -- actually, the supervisor 12 contacted me. I was working as the desk officer 13 that night in the First Precinct. The supervisor 14 said that, Hey, we picked up a wanted. Gave me 15 Mr. Furlow's information and then said, you know, 16 he's saying he wants a lawyer. He's invoked his 17 right, and he's shouting expletives at us, and 18 that's about it. 19 <b>Q. Yeah. And what did you say?</b> 20 A. I said, Okay. 21 <b>And he said, He's already invoked his</b> 22 <b>right. Do you just want us to cancel the teletype</b> 23 <b>and -- and supplement it?</b> 24 <b>And I said, Yes.</b> 25 <b>Q. So I'm just reading from the narrative</b></p>

34 (Pages 133 to 136)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

Page 137	Page 139
<p>1 portion here, if you take a look at sort of the</p> <p>2 paragraph that starts "on the above date." The</p> <p>3 second sentence reads, "I contacted the</p> <p>4 investigating Officer Walsh, DSN4068, and he asked</p> <p>5 this officer to do the interview."</p> <p>6 Did -- is -- it sounds a little bit</p> <p>7 different from what you described. Is there, based</p> <p>8 on Mr. Furlow's invocation of his right not to -- to</p> <p>9 speak, is an interview conducted in your experience,</p> <p>10 or is the teletype just canceled?</p> <p>11 A. Could you --</p> <p>12 Q. Yeah, sure.</p> <p>13 A. Please.</p> <p>14 Q. That is -- that was muddled.</p> <p>15 Did you ask the officer to conduct an</p> <p>16 interview?</p> <p>17 A. When I was told that he was screaming</p> <p>18 and yelling and saying he wants, you know, wants a</p> <p>19 lawyer, I said, you know, Conduct the interview,</p> <p>20 give him -- read him his rights, that he wants his</p> <p>21 -- if he wants his attorney, then I'll take care of</p> <p>22 the warrant application.</p> <p>23 But beings that I was on the desk, he</p> <p>24 was there and he was already yelling to begin with.</p> <p>25 The officer that made the arrest, I -- I told him</p>	<p>1 Q. Did you apply for a warrant thereafter?</p> <p>2 A. Uh-huh.</p> <p>3 Q. And was -- what was the result of that</p> <p>4 warrant?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Okay.</p> <p>7 A. After I applied, this came about and I</p> <p>8 kind of stayed out of it then.</p> <p>9 Q. Did you hear anything from the</p> <p>10 prosecutor's office --</p> <p>11 A. No.</p> <p>12 Q. -- about your application?</p> <p>13 A. No.</p> <p>14 Q. And so following your conversation with</p> <p>15 the officer who arrested Mr. Furlow, was</p> <p>16 Mr. Furlow -- based on your understanding, was he --</p> <p>17 was he released?</p> <p>18 A. He was held 24 hours.</p> <p>19 Q. And he was held 24 hours because?</p> <p>20 A. Department policy.</p> <p>21 Q. Based on -- based on --</p> <p>22 A. Domestic violence.</p> <p>23 Q. It was based on it being a domestic</p> <p>24 violence instance. So he was just held for a</p> <p>25 straight 24 hours.</p>
Page 138	Page 140
<p>1 to -- to conduct the formal interview.</p> <p>2 Q. Okay. Did you learn anything about</p> <p>3 sort of what that formal interview entailed?</p> <p>4 A. Mirandizing and -- and telling him he</p> <p>5 wants his lawyer and yelling at the officers.</p> <p>6 Q. Okay. And based on your sort of</p> <p>7 understanding and recollection of things, what</p> <p>8 happened next?</p> <p>9 A. That was it. The wanted was canceled.</p> <p>10 And then --</p> <p>11 MR. HUGHES: Okay. Is that what</p> <p>12 happened next?</p> <p>13 THE WITNESS: Yeah.</p> <p>14 MR. HUGHES: Okay.</p> <p>15 BY MR. HAMILTON:</p> <p>16 Q. Now, it says on the final page here at</p> <p>17 the very top of the page, it says "Case</p> <p>18 responsibility will be with PO Walsh."</p> <p>19 What does that mean?</p> <p>20 A. That means that the -- the actual case</p> <p>21 will be my responsibility to do any follow-ups, to</p> <p>22 conduct warrant application, things of that nature.</p> <p>23 Q. And did you -- did you apply for a</p> <p>24 warrant?</p> <p>25 A. Not right then and there, no.</p>	<p>1 Were you aware of any other questioning</p> <p>2 that occurred?</p> <p>3 A. No.</p> <p>4 Q. Have you ever had -- did you ever</p> <p>5 encounter Mr. Furlow after -- after this instance?</p> <p>6 A. Yes.</p> <p>7 Q. What were those encounters?</p> <p>8 A. The first one was -- I don't know the</p> <p>9 exact date. It was a couple days after he was</p> <p>10 arrested and released. I had received a call from</p> <p>11 Mrs. Furlow wishing to recant her statement. After</p> <p>12 that, I advised her that she needed to come in</p> <p>13 person to give a written statement --</p> <p>14 Q. Uh-huh.</p> <p>15 A. -- of her account of events both days,</p> <p>16 why she was recanting, and I also asked her if she</p> <p>17 was being forced into making this statement, in</p> <p>18 which she said, no. Mrs. Furlow never responded, to</p> <p>19 my knowledge, to the First Precinct.</p> <p>20 Q. Uh-huh.</p> <p>21 A. So therefore after Mr. Furlow was</p> <p>22 released, I responded back to their residence to try</p> <p>23 and get ahold of Mrs. Furlow to see if I could kind</p> <p>24 of get a one-on-one with her to see why she recanted</p> <p>25 her statement, make sure she's all right. And that</p>

35 (Pages 137 to 140)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 141</p> <p>1 was our first encounter with Mr. Furlow. 2 <b>Q. Okay. And there were others?</b> 3 A. Yes. 4 <b>Q. What were the nature of those other --</b> 5 <b>other encounters?</b> 6 A. It was calls for service to and around 7 their residence. Neighbors had called to complain 8 that their -- the Furlows' children, one was cutting 9 through the backyard of this gentleman's residence 10 and damaged their fence. 11 Another was a -- a property owner of a 12 residence on their property, neighbor called saying 13 that his shed of his -- next to his house, the 14 shingles were being ripped off by Mr. Furlow's son. 15 And I believe another one was for a 16 loose dog that came from the Furlow's residence that 17 was apparently chasing and attacking small children 18 in the neighborhood. 19 <b>Q. And on what basis did you apply for a</b> 20 <b>warrant for Mr. Furlow?</b> 21 MR. HUGHES: Well, are you talking 22 about the domestic violence case? Or are you 23 talking about -- 24 MR. HAMILTON: Well, I'm -- I'm just 25 going back to Detective Walsh's prior testimony.</p>	<p style="text-align: right;">Page 143</p> <p>1 accomplish all of those things, move out. 2 <b>Q. Uh-huh. Is this something that would</b> 3 <b>be employed if somebody were picked up on a wanted</b> 4 <b>days, weeks, or months after the initial incident?</b> 5 A. Uh-huh, yes. 6 <b>Q. So even -- even if the exigency, let's</b> 7 <b>call it, is -- or the -- the time close to the</b> 8 <b>incident has now grown, that 24-hour sort of</b> 9 <b>mandatory hold for domestic violence suspects is</b> 10 <b>still enforced?</b> 11 A. Yes. 12 MR. HAMILTON: Okay. Mr. Hughes, I'll 13 pass the witness to you. 14 MR. HUGHES: Oh, thank you. 15 EXAMINATION 16 BY MR. HUGHES: 17 <b>Q. First, a few matters just to see if I</b> 18 <b>understood your -- some of your testimony correctly</b> 19 <b>or not. Maybe I did, maybe I didn't.</b> 20 <b>You gave some testimony that, to my</b> 21 <b>ears, and my hearing is getting not as good as it</b> 22 <b>used to be, sounded a little bit conflicting. You</b> 23 <b>made a statement, and I'm looking at my notes, which</b> 24 <b>it's hard to read my notes. Certain municipalities</b> 25 <b>have said you can release to a court date. And then</b></p>
<p style="text-align: right;">Page 142</p> <p>1 MR. HUGHES: Okay. 2 MR. HAMILTON: You said you applied for 3 a warrant. 4 THE WITNESS: Right. 5 BY MR. HAMILTON: 6 <b>Q. And what was the basis for that</b> 7 <b>application?</b> 8 A. The domestic violence. 9 <b>Q. Domestic violence, okay.</b> 10 A. Yes. 11 <b>Q. I just want to go back quickly to -- to</b> 12 <b>the policy. What is the purpose of the 24-hour hold</b> 13 <b>policy for domestic violence?</b> 14 A. A number of things. One, the victim is 15 able to seek an order of protection against the 16 suspect. Could seek medical attention -- 17 <b>Q. Uh-huh.</b> 18 A. -- that that person maybe was in fear 19 of -- of doing while the suspect was near or around 20 them. And it's also -- can be used for that 21 person -- it becomes real when a suspect is 22 arrested. 23 <b>Q. Uh-huh.</b> 24 A. So it kind of gives the ability for the 25 victim to feel a little bit, I guess, empowered to</p>	<p style="text-align: right;">Page 144</p> <p>1 <b>another point you said something, other</b> 2 <b>jurisdictions -- I can't read my writing, but you</b> 3 <b>talk about -- this was in connection with wanteds.</b> 4 <b>So -- and my question is -- is St. Louis County --</b> 5 <b>is St. Louis County Police Department the only</b> 6 <b>jurisdiction that employs wanteds, to your</b> 7 <b>knowledge?</b> 8 A. No. 9 <b>Q. Okay. So -- and these attorneys who</b> 10 <b>came from out-of-state may not realize, for example,</b> 11 <b>that the City of St. Louis is sort of a county</b> 12 <b>within a county -- a county within -- is sort of its</b> 13 <b>own county; is that correct?</b> 14 A. Correct. 15 <b>Q. So there's St. Louis County where</b> 16 <b>we're at -- you know, and then there's the County of</b> 17 <b>the City of St. Louis; is that correct?</b> 18 A. Yes. 19 <b>Q. Okay. Does the County of the City of</b> 20 <b>St. Louis employ wanteds?</b> 21 A. Yes. 22 <b>Q. Yeah. So -- so in your experience, for</b> 23 <b>example, driving a patrol car if you happen to pull</b> 24 <b>someone over, there could be a wanted for the City</b> 25 <b>of St. Louis; is that correct?</b></p>

36 (Pages 141 to 144)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 145	Page 147
<p>1 A. Yes.</p> <p>2 Q. And then there are -- in St. Louis</p> <p>3 County there are multiple, multiple municipalities;</p> <p>4 is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Do those multiple municipalities use</p> <p>7 systems of wanteds too?</p> <p>8 A. Yes.</p> <p>9 Q. Now, I think there's been testimony</p> <p>10 in -- in some other deposition about REJIS being a</p> <p>11 regional system; is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. And is it your -- do you know, is</p> <p>14 St. Charles County part of REJIS too?</p> <p>15 A. Yes, I believe so.</p> <p>16 Q. Okay. So -- so anyway, would it be</p> <p>17 fair statement that all these, you know,</p> <p>18 municipalities or counties who are part of the REJIS</p> <p>19 system, they use the system of wanteds; is that</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. And so St. Louis County does not stand</p> <p>23 alone; is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. And correct me if I'm wrong. Kansas --</p>	<p>1 on a -- summons; is that -- is that a fair</p> <p>2 statement?</p> <p>3 A. Uh-huh.</p> <p>4 MR. HAMILTON: Objection to form.</p> <p>5 BY MR. HUGHES:</p> <p>6 Q. So in those statements you -- and then</p> <p>7 if you apply for a warrant, you would apply for a</p> <p>8 warrant without having issued a wanted; is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you made some statement that</p> <p>12 they have 24 hours to conduct an interview. Or</p> <p>13 maybe you just said yes to that question.</p> <p>14 And are you familiar with the 24-hour</p> <p>15 statute?</p> <p>16 A. Yes.</p> <p>17 Q. Now, are officers trained to do what</p> <p>18 they can to -- other than let's say domestic</p> <p>19 violence cases, to -- to do what they can to apply</p> <p>20 before the expiration of the 24 hours?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So -- if all of a sudden they</p> <p>23 have information in five hours or ten hours or 16</p> <p>24 hours, they -- they do so; is that correct?</p> <p>25 A. Yes.</p>
Page 146	Page 148
<p>1 would it be correct, that the Kansas City area, if</p> <p>2 you know this, has a system of wanteds except they</p> <p>3 have a different name like stop orders or persons of</p> <p>4 interest, but it's the same thing; is that correct?</p> <p>5 MR. HAMILTON: Objection to form.</p> <p>6 BY MR. HUGHES:</p> <p>7 Q. As far as you know or not?</p> <p>8 A. I'm unaware of Kansas City.</p> <p>9 Q. Okay. But as far as -- okay. And I</p> <p>10 think you might have asked -- might have answered a</p> <p>11 question this way. I know you're asked a lot of</p> <p>12 questions, but it seemed like you were asked, is a</p> <p>13 warrant always preceded by a wanted? And according</p> <p>14 to my notes, you said, yes. And I think I might</p> <p>15 have objected to the form of the question as being</p> <p>16 overbroad, but -- so I want to follow up on that,</p> <p>17 but I just wanted to, you know --</p> <p>18 MR. HAMILTON: Objection to form.</p> <p>19 BY MR. HUGHES:</p> <p>20 Q. -- leading up. If, for example, you</p> <p>21 speak to someone on -- right on the scene and, you</p> <p>22 know, you asked them to give you a statement, and</p> <p>23 they give you their statement and then you decide to</p> <p>24 bring them into custody or not to bring them into</p> <p>25 custody or to just move on or to -- to release them</p>	<p>1 Q. Okay. They don't -- it's not the</p> <p>2 practice to wait til the 23 -- 23 and a half hours</p> <p>3 go by, is it?</p> <p>4 A. No.</p> <p>5 Q. Okay. Let me -- why don't we mark this</p> <p>6 as Defendant's Exhibit A.</p> <p>7 (Exhibit A was marked for</p> <p>8 identification.)</p> <p>9 BY MR. HUGHES:</p> <p>10 Q. Now, looking at Defendant's Exhibit A,</p> <p>11 what -- what is that?</p> <p>12 A. This is a calls for service via CAD.</p> <p>13 Q. Okay. And -- and those are -- I think</p> <p>14 you alluded to this earlier -- has, you know, kind</p> <p>15 of like a dispatcher summary of things or --</p> <p>16 A. Yes.</p> <p>17 Q. -- entries made by the dispatcher; is</p> <p>18 that correct?</p> <p>19 A. Yes.</p> <p>20 Q. They're -- they're not entries made by</p> <p>21 you; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And so it indicates that there</p> <p>24 was a caller; is that correct?</p> <p>25 A. Yes.</p>

37 (Pages 145 to 148)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 149

1 Q. And what is the name of the caller?  
2 A. That says Steve Arnold.  
3 Q. Okay. So this caller was not Latoya  
4 Furlow; is that correct?  
5 A. Correct.  
6 Q. And then it also has an address of the  
7 caller; is that correct?  
8 A. Yes.  
9 Q. What is that?  
10 A. [REDACTED].  
11 Q. So that is -- you've learned that's not  
12 the Furlow's address; is that correct?  
13 A. Yes.  
14 Q. Okay. And also it indicates the call  
15 was received at what time?  
16 A. 12:25.  
17 Q. Okay. And then did the dispatcher --  
18 does it appear that the dispatcher notified any  
19 other entity other than the police department first  
20 or at any time?  
21 A. Spanish Lake Fire and Christian  
22 Hospital EMS.  
23 Q. So -- so the dispatcher, you gather  
24 from that the dispatcher here -- upon hearing the  
25 call notified EMS? Is that correct? And even the

Page 150

1 fire department?  
2 A. Yes.  
3 Q. Is that correct?  
4 Now, when EMS in -- in a violent  
5 situation and fire department are notified, do they  
6 go right to the scene, or do they stage nearby until  
7 it's safe?  
8 A. They stage.  
9 Q. Okay. And -- and then at 12:26, is  
10 there an entry there by the dispatcher?  
11 A. Yes.  
12 Q. And what does it say?  
13 A. "Neighbor came over stating her husband  
14 beat her up."  
15 Q. Okay. So initially that's not the --  
16 Latoya Furlow calling to say, my husband beat me up.  
17 It's a neighbor came over stating her husband beat  
18 her up; is that correct?  
19 A. Yes.  
20 Q. Okay. And then it has something about  
21 at 12:27 there's a couple entries that I can't quite  
22 make out. What are they?  
23 A. First one, "He is at 1230."  
24 Q. Do you know what that means?  
25 A. 1230 Maple is their residence.

Page 151

1 Q. Oh, I see. Okay. And then -- and then  
2 after that, what does it say?  
3 A. "Dwayne, black male, Cadillac DTS,  
4 tinted windows."  
5 Q. Which means what?  
6 A. He is potentially driving a Cadillac  
7 DTS.  
8 Q. Oh, okay, with tinted windows. Okay.  
9 And -- and then -- and then -- after that what does  
10 it say?  
11 A. "Direction of travel, right towards  
12 Larimore." It says "Latimore" but it should be  
13 "Larimore Road."  
14 Q. Okay. And -- and then 12:38, what does  
15 it say?  
16 A. "Ambulance is 76" -- which means  
17 en route -- "and advise when scene is secure."  
18 Q. So that would suggest to you they're  
19 going to stage someplace when it's secure; is that  
20 correct?  
21 A. Yes.  
22 Q. Okay. And -- and then at -- after that  
23 12:28, what does it state?  
24 A. "He departed in vehicle with daughter."  
25 Q. Okay. And then -- and then after that,

Page 152

1 what does it state at 12:28?  
2 A. "Caller distraught and crying on  
3 phone."  
4 Q. Okay. So initially the -- a neighbor  
5 called at 12:25, it looks like, and then three  
6 minutes later it's no longer the neighbor. It's --  
7 it's Mrs. Furlow, "Caller distraught and crying on  
8 the phone." Is that correct?  
9 A. Yes.  
10 Q. Okay. Then what time did you arrive?  
11 A. I arrived at 12:36.  
12 Q. Okay. So you arrived -- let's see.  
13 That would be eight minutes later after the  
14 dispatcher hears a caller distraught and crying on  
15 the phone; is that correct?  
16 A. Yes.  
17 Q. Will you describe in detail, or at  
18 least give us, you know, some sort of description of  
19 whether or not when you arrived eight minutes later,  
20 whether or not she was crying and distraught?  
21 A. She was crying profusely.  
22 Q. Okay. And what about distraught?  
23 Would you still describe it as distraught?  
24 A. Yes.  
25 Q. Okay. How long did that crying

38 (Pages 149 to 152)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 153

1 continue while you were there?  
2 A. Until I left the scene and she was  
3 driving away in her vehicle.  
4 Q. Okay. And she was driving away and --  
5 so she was crying -- so she was crying -- driving  
6 away in her vehicle?  
7 A. Yes.  
8 Q. So you talked before about a protective  
9 sweep. Was she crying while you were doing the  
10 protective sweep?  
11 A. Yes.  
12 Q. Was she still distraught while you were  
13 doing the protective sweep?  
14 A. Yes.  
15 Q. Okay. And did -- did -- did you have  
16 any reason to believe that her life could be in  
17 danger or that this was a very, very dangerous  
18 situation?  
19 A. Yes.  
20 Q. Tell us why.  
21 A. I treat every domestic as such. Just  
22 because there's a lot of emotion that goes into  
23 them. When I got into the basement and saw the  
24 loaded AR15 and Mrs. Furlow in her state of mind,  
25 stating that she was in fear that, you know, Dwayne

Page 154

1 was going to come back or Dwayne was -- being that  
2 he was on -- on probation and a convicted felon, he  
3 had a little bit more, I guess, to worry about that  
4 he's dealing with a probation status as well.  
5 Q. Okay. So he had -- he had -- he had to  
6 worry not only about this domestic violence charge.  
7 He had to worry about his probation status; is that  
8 correct?  
9 MR. HAMILTON: Objection to form.  
10 BY MR. HUGHES:  
11 Q. Is that what you just said?  
12 A. Yes.  
13 Q. Okay. So you still -- did you -- while  
14 she was doing all this -- while she was being  
15 distraught and while she was crying, did you have  
16 any reason to think that she was making all this up?  
17 A. No.  
18 Q. Do you have any reason to think she was  
19 putting on an act?  
20 A. No.  
21 Q. Did you think she was very believable?  
22 A. Yes.  
23 Q. Did -- did you believe she was truly in  
24 distress?  
25 A. Yes.

Page 155

1 Q. Did you do anything to try to show  
2 concern and compassion towards her?  
3 A. Counseled her on how to obtain a  
4 protection order for her and her children. I  
5 secured several items into her vehicle, and I stayed  
6 with her until she gathered up a good portion of her  
7 belongings and placed them into her vehicle.  
8 Q. Now, tell us about that AR15 rifle.  
9 Was it empty?  
10 A. No.  
11 Q. Tell us about it.  
12 A. There was one live round in the  
13 chamber, and there were 29 rounds in the magazine.  
14 Q. Okay. So I notice that there's an  
15 alderman in the City of St. Louis -- I realize  
16 that's a different jurisdiction than St. Louis  
17 County -- has said she wants -- wants to file some  
18 sort of bill to make AR15s completely illegal in the  
19 City of St. Louis?  
20 MR. HAMILTON: Objection to form.  
21 BY MR. HUGHES:  
22 Q. Were you aware of that?  
23 A. Yes.  
24 Q. Would you agree they're highly  
25 dangerous?

Page 156

1 A. Yes.  
2 MR. HAMILTON: Objection to form.  
3 BY MR. HUGHES:  
4 Q. Now -- now, why -- why is it -- did  
5 she -- did -- did Mrs. Furlow explain to you why  
6 they had the AR15 rifle in the house?  
7 A. Yes.  
8 Q. What was that?  
9 A. For their protection.  
10 Q. They needed an AR15 rifle in their  
11 house --  
12 MR. HAMILTON: Objection to form.  
13 BY MR. HUGHES:  
14 Q. -- for their protection, is that what  
15 you're saying?  
16 A. Yes.  
17 Q. Okay. Did -- did that alert you that  
18 this is -- did -- did that alert you that that would  
19 also be dangerous?  
20 MR. HAMILTON: Objection to form.  
21 BY MR. HUGHES:  
22 Q. Is that correct?  
23 A. Yes.  
24 Q. Do you have -- did she volunteer what  
25 could be going on in the house that -- where they

39 (Pages 153 to 156)



KEVIN WALSH 2/9/2017

Page 157	Page 159
<p>1 would need an AR15 rifle for protection?</p> <p>2 MR. HAMILTON: Objection to form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MR. HUGHES:</p> <p>5 Q. Okay. Now, you alluded to something a</p> <p>6 little while ago that she had mentioned that she had</p> <p>7 purchased that AR15 rifle herself?</p> <p>8 A. Yes.</p> <p>9 MR. HAMILTON: Objection.</p> <p>10 BY MR. HUGHES:</p> <p>11 Q. Now, what did you say about that?</p> <p>12 A. She said she -- she purchased the AR15</p> <p>13 because Dwayne was on probation, couldn't purchase</p> <p>14 it himself.</p> <p>15 Q. Now -- okay. So why -- why couldn't he</p> <p>16 purchase it himself?</p> <p>17 MR. HAMILTON: Objection.</p> <p>18 THE WITNESS: Because he's a convicted</p> <p>19 felon.</p> <p>20 BY MR. HUGHES:</p> <p>21 Q. Oh, so you're saying in the State of</p> <p>22 Missouri, convicted felons aren't supposed to have</p> <p>23 AR15 rifles?</p> <p>24 MR. HAMILTON: Objection.</p> <p>25 THE WITNESS: Yes, in the country as</p>	<p>1 MR. HAMILTON: Objection.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MR. HUGHES:</p> <p>4 Q. Okay. Now, you indicated you helped</p> <p>5 carry some boxes of clothing to the car; is that</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. What about that rifle?</p> <p>9 A. Yes.</p> <p>10 Q. Yes, what?</p> <p>11 A. I carried it to the vehicle.</p> <p>12 Q. Did you keep it loaded?</p> <p>13 A. No.</p> <p>14 Q. What did you do?</p> <p>15 A. I rendered it safe by unloading it.</p> <p>16 Q. Okay. And did she specifically tell</p> <p>17 you that she would prosecute her husband?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. You indicated that assault B --</p> <p>20 you were charging her with assault third and</p> <p>21 domestic peace -- you're going to charge Mr. Furlow</p> <p>22 with assault third and domestic peace disturbance;</p> <p>23 is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. If this happened today instead of a</p>
Page 158	Page 160
<p>1 well.</p> <p>2 BY MR. HUGHES:</p> <p>3 Q. Okay. And -- and what about this --</p> <p>4 this fact that -- well, let me ask you this: How</p> <p>5 would you describe the purchase by a spouse of --</p> <p>6 MR. HAMILTON: Objection.</p> <p>7 MR. HUGHES: -- of a AR15 rifle, you</p> <p>8 know, for -- for her spouse who's a convicted felon?</p> <p>9 MR. HAMILTON: Objection.</p> <p>10 THE WITNESS: So per federal</p> <p>11 guidelines, it's a straw purchase.</p> <p>12 BY MR. HUGHES:</p> <p>13 Q. So this is a federal offense; is that</p> <p>14 correct?</p> <p>15 MR. HAMILTON: Objection.</p> <p>16 BY MR. HUGHES:</p> <p>17 Q. You said -- did you say per federal --</p> <p>18 A. Yes.</p> <p>19 Q. -- laws? Okay.</p> <p>20 And -- and the fact that she may have</p> <p>21 violated a federal law by making a straw purchase --</p> <p>22 MR. HAMILTON: Objection.</p> <p>23 BY MR. HUGHES:</p> <p>24 Q. -- would that suggest to you that this</p> <p>25 man could be manipulative?</p>	<p>1 year ago when it happened -- are the domestic</p> <p>2 violence statutes different? Could you have charged</p> <p>3 them with something different today?</p> <p>4 MR. HAMILTON: Objection.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. HUGHES:</p> <p>7 Q. What?</p> <p>8 A. A Class E felony.</p> <p>9 Q. Okay. So if the same thing happened</p> <p>10 today, Mr. Furlow could be charged with a Class E</p> <p>11 felony; is that correct?</p> <p>12 MR. HAMILTON: Objection.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. HUGHES:</p> <p>15 Q. Okay. Now, you mentioned earlier that</p> <p>16 the next day you spoke to her on the telephone and</p> <p>17 she recanted; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Tell us your thoughts about that --</p> <p>20 MR. HAMILTON: Objection.</p> <p>21 BY MR. HUGHES:</p> <p>22 Q. -- when she recanted.</p> <p>23 A. She stated that she wished to recant</p> <p>24 her statement and that she made everything up. I</p> <p>25 asked her if she would -- if anybody was coercing</p>

40 (Pages 157 to 160)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 161</p> <p>1 her into making that statement, and she said, no.</p> <p>2 I asked her to respond to the First</p> <p>3 Precinct in person and make a written statement.</p> <p>4 She wanted to know what was going to happen, and I</p> <p>5 told her that per State of Missouri, all domestics</p> <p>6 are still investigated and victimless crimes are</p> <p>7 prosecuted. So that her statement would be taken</p> <p>8 into account, but ultimately the prosecuting</p> <p>9 attorney would determine.</p> <p>10 <b>Q. That's -- that's nice. But let me ask</b></p> <p>11 <b>you this: Did -- did the recanting the next day --</b></p> <p>12 MR. HAMILTON: Objection.</p> <p>13 BY MR. HUGHES:</p> <p>14 <b>Q. -- did it ring true to you?</b></p> <p>15 A. No. It seemed a little odd.</p> <p>16 <b>Q. Tell us why.</b></p> <p>17 A. It seemed odd by her statement on-scene</p> <p>18 and then her demeanor.</p> <p>19 <b>Q. On-scene?</b></p> <p>20 A. Yes.</p> <p>21 <b>Q. Okay. And -- and how was she talking</b></p> <p>22 <b>to you when she was on the telephone and she wanted</b></p> <p>23 <b>to recant? Was her voice patterns different?</b></p> <p>24 A. She was very fast-paced. She seemed a</p> <p>25 little agitated, anxious.</p>	<p style="text-align: right;">Page 163</p> <p>1 BY MR. HUGHES:</p> <p>2 <b>Q. She was still crying long after the</b></p> <p>3 <b>call -- the initial call was made by the neighbor;</b></p> <p>4 <b>is that correct?</b></p> <p>5 MR. HAMILTON: Objection.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MR. HUGHES:</p> <p>8 <b>Q. Okay. Now, you testified earlier that</b></p> <p>9 <b>you did speak with Mr. Furlow on the telephone; is</b></p> <p>10 <b>that correct? That you spoke with a man that you</b></p> <p>11 <b>were pretty sure was Mr. Furlow and you explained</b></p> <p>12 <b>why; is that correct?</b></p> <p>13 A. Yes.</p> <p>14 <b>Q. Okay. When -- and you mentioned</b></p> <p>15 <b>earlier that he said -- and including the words he</b></p> <p>16 <b>said was, If I turn myself in, I will be locked up;</b></p> <p>17 <b>is that correct?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Did he ever deny that he did not strike</b></p> <p>20 <b>his wife?</b></p> <p>21 A. No.</p> <p>22 MR. HAMILTON: Objection.</p> <p>23 BY MR. HUGHES:</p> <p>24 <b>Q. He never once did?</b></p> <p>25 A. No.</p>
<p style="text-align: right;">Page 162</p> <p>1 <b>Q. And -- and tell us again why you wanted</b></p> <p>2 <b>her to come in. I mean, did you have any concern</b></p> <p>3 <b>about her?</b></p> <p>4 A. Yes. I did.</p> <p>5 <b>Q. What? Tell us.</b></p> <p>6 A. I had concern for her. She said she</p> <p>7 had multiple children that were living in the house</p> <p>8 as well. And in my dealing with domestics, usually</p> <p>9 recanting can -- can occur, but more times than not,</p> <p>10 the first statement that is made by the victim is</p> <p>11 usually the most truthful one.</p> <p>12 <b>Q. Okay. Now, you were asked what the</b></p> <p>13 <b>probable cause was to -- to arrest Mr. Furlow.</b></p> <p>14 <b>First of all, you saw Mrs. Furlow yourself; is that</b></p> <p>15 <b>correct?</b></p> <p>16 A. Yes.</p> <p>17 MR. HAMILTON: Objection.</p> <p>18 BY MR. HUGHES:</p> <p>19 <b>Q. And -- and -- and she made a statement</b></p> <p>20 <b>to you that she had been assaulted; is that correct?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. And also you mentioned before she was</b></p> <p>23 <b>crying and she was distraught; is that correct?</b></p> <p>24 MR. HAMILTON: Objection.</p> <p>25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 164</p> <p>1 <b>Q. Okay. So just add all these things up.</b></p> <p>2 <b>You -- you -- you saw what you saw. You saw</b></p> <p>3 <b>Mrs. Furlow crying and being distressed -- being</b></p> <p>4 <b>distraught and saying she wants to prosecute; is</b></p> <p>5 <b>that correct?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. And then when you spoke to Mr. Furlow</b></p> <p>8 <b>on the phone, he did not deny that he struck her; is</b></p> <p>9 <b>that correct?</b></p> <p>10 MR. HAMILTON: Objection.</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MR. HUGHES:</p> <p>13 <b>Q. And -- and then regarding the 24-hour</b></p> <p>14 <b>hold in domestic violence cases, I know there is</b></p> <p>15 <b>something alleged in the first amended complaint</b></p> <p>16 <b>which was -- I'll read it to you -- which was Gomez</b></p> <p>17 <b>Exhibit 4, where it's alleged that an attorney,</b></p> <p>18 <b>presumably an attorney for Mr. Furlow, spoke to a</b></p> <p>19 <b>Sergeant James Grace about Mr. Furlow being in</b></p> <p>20 <b>custody. And I don't know if he spoke -- I don't</b></p> <p>21 <b>know who this attorney was. He wasn't identified.</b></p> <p>22 <b>But it says that Sergeant James Grace made the</b></p> <p>23 <b>statement to counsel that Walsh followed department</b></p> <p>24 <b>procedures?</b></p> <p>25 MR. HAMILTON: Objection.</p>

41 (Pages 161 to 164)

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 165</p> <p>1 BY MR. HUGHES:</p> <p>2 Q. So my question to you is: Is it true</p> <p>3 you followed department procedures in everything you</p> <p>4 did?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And even -- even this 24-hour</p> <p>7 domestic violence hold, was there anything in the</p> <p>8 report where you said, I -- I -- I want him held for</p> <p>9 24 hours?</p> <p>10 A. No.</p> <p>11 Q. Okay. But it is a policy of the police</p> <p>12 department; is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. You're not some sort of rogue cop, and</p> <p>15 I apologize for using that term --</p> <p>16 MR. HAMILTON: Objection.</p> <p>17 BY MR. HUGHES:</p> <p>18 Q. -- going outside the policy; is that</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. So you're just doing your job;</p> <p>22 is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have any malice towards</p> <p>25 Mr. Furlow?</p>	<p style="text-align: right;">Page 167</p> <p>1 A. Yes.</p> <p>2 Q. And would you agree that, you know --</p> <p>3 would you agree that the -- it gives the victim, you</p> <p>4 know, some physical emotional protection during this</p> <p>5 24 hours?</p> <p>6 A. Yes.</p> <p>7 Q. And you mentioned it -- it makes it</p> <p>8 real, when you said that, it makes it real for the</p> <p>9 domestic abuser; is that correct?</p> <p>10 A. Yes.</p> <p>11 MR. HAMILTON: Objection.</p> <p>12 BY MR. HUGHES:</p> <p>13 Q. And would be -- so the hope is he won't</p> <p>14 do it again; is that correct?</p> <p>15 MR. HAMILTON: Objection.</p> <p>16 THE WITNESS: Yes.</p> <p>17 BY MR. HUGHES:</p> <p>18 Q. Would you agree it's not intended for</p> <p>19 you to do an investigation?</p> <p>20 A. Yes.</p> <p>21 Q. Would you agree it's only intended to</p> <p>22 protect the victim?</p> <p>23 A. Yes.</p> <p>24 Q. Let's -- let's go to -- let's make sure</p> <p>25 we've covered everything in the police report that's</p>
<p style="text-align: right;">Page 166</p> <p>1 A. No.</p> <p>2 Q. Did you know him before?</p> <p>3 A. No.</p> <p>4 Q. Did you have any ill will towards</p> <p>5 Mr. Furlow?</p> <p>6 A. No.</p> <p>7 Q. Okay. Were you just attempting to</p> <p>8 punish Mr. Furlow for any reason?</p> <p>9 A. No.</p> <p>10 MR. HAMILTON: Objection.</p> <p>11 BY MR. HUGHES:</p> <p>12 Q. Okay. Now, you sort of addressed</p> <p>13 various reasons why, you know, you think that a</p> <p>14 24-hour old for domestic violence cases exist. But</p> <p>15 was that there before you started, by the way?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. But you mentioned it gives the</p> <p>18 victim time to engage -- to get -- for an order of</p> <p>19 protection; is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. And it also gives the victim time to</p> <p>22 seek medical help; is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. And would it be true it also gives the</p> <p>25 victim time to find and move into a safe house?</p>	<p style="text-align: right;">Page 168</p> <p>1 been marked as an exhibit, Exhibit 6, Walsh 6.</p> <p>2 So on the front page it says, "Call</p> <p>3 received radio."</p> <p>4 And then it says, "Reporting Officer</p> <p>5 Walsh." Is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. So just -- just so we understand, and I</p> <p>8 guess it goes without saying, but let's say it. You</p> <p>9 did not arrive making accusations to Mr. Furlow.</p> <p>10 There was a call on the radio where someone else was</p> <p>11 making accusations; is that a fair statement?</p> <p>12 MR. HAMILTON: Objection.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. HUGHES:</p> <p>15 Q. Okay. And -- and the initial caller,</p> <p>16 we dealt with this in the CAD report, was someone</p> <p>17 named Steve Arnold; is that correct?</p> <p>18 MR. HAMILTON: Objection.</p> <p>19 THE WITNESS: Yes.</p> <p>20 BY MR. HUGHES:</p> <p>21 Q. That's listed there? Okay.</p> <p>22 And -- and it says "Final Approval."</p> <p>23 And it has a supervisor review that was the next</p> <p>24 day. And then you mention there's a CARE final</p> <p>25 approval. That CARE clerk doesn't approve it for</p>

42 (Pages 165 to 168)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

<p style="text-align: right;">Page 169</p> <p>1 probable cause. Would it be a fair statement she</p> <p>2 approves it for whatever the procedures for CARE is</p> <p>3 involved?</p> <p>4 A. Yes.</p> <p>5 MR. HAMILTON: Objection.</p> <p>6 BY MR. HUGHES:</p> <p>7 Q. Okay. And it listed the -- the</p> <p>8 victim's name? Latoya Furlow; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. And -- oh, here's something that wasn't</p> <p>11 addressed on earlier questioning. It says,</p> <p>12 "Physical state/emotions." And what are -- what</p> <p>13 are -- what did you put there?</p> <p>14 A. Angry, crying, fearful, afraid,</p> <p>15 nervous.</p> <p>16 Q. Okay. And I -- by the way, I want you</p> <p>17 to assume it's true, that there was a deposition</p> <p>18 yesterday where Mr. Furlow, with his attorney,</p> <p>19 turned himself in --</p> <p>20 MR. HAMILTON: Objection.</p> <p>21 BY MR. HUGHES:</p> <p>22 Q. -- to the police station. I just want</p> <p>23 you to assume it's true, and then he was released on</p> <p>24 a summons.</p> <p>25 Let me ask you this: You were asked --</p>	<p style="text-align: right;">Page 171</p> <p>1 against another female was Mr. Furlow?</p> <p>2 MR. HAMILTON: Objection.</p> <p>3 THE WITNESS: Yes.</p> <p>4 BY MR. HUGHES:</p> <p>5 Q. Okay. So now you -- so now you know</p> <p>6 that at least two times he's been accused of</p> <p>7 violence to a female; is that correct?</p> <p>8 MR. HAMILTON: Objection.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. HUGHES:</p> <p>11 Q. Okay. And you -- you mentioned that</p> <p>12 you issued a wanted but you still -- you didn't stop</p> <p>13 there. You actually went by the house; is that</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you -- did you have a -- one of the</p> <p>17 reasons you went by the house is to make sure</p> <p>18 Mrs. Furlow was okay; is that correct?</p> <p>19 A. I was making sure that if she did</p> <p>20 return back to her residence that she was okay and</p> <p>21 see if Mr. Furlow did, in fact, return to the</p> <p>22 residence.</p> <p>23 Q. And also you went back -- you were</p> <p>24 looking for Mr. Furlow; is that correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 170</p> <p>1 did -- did any attorney ever call you up and say,</p> <p>2 Now we'll turn him in --</p> <p>3 THE WITNESS: No.</p> <p>4 BY MR. HUGHES:</p> <p>5 Q. -- voluntarily? Okay.</p> <p>6 And -- oh, speaking of that, you did</p> <p>7 mention before when you were asked what you reviewed</p> <p>8 in preparation for the deposition, you did mention</p> <p>9 that you read this complaint; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. And --</p> <p>12 MR. HAMILTON: Objection.</p> <p>13 BY MR. HUGHES:</p> <p>14 Q. -- and so that's one of the things you</p> <p>15 reviewed; is that correct?</p> <p>16 A. Yes.</p> <p>17 Q. And did you read that at another time</p> <p>18 before this -- this case of violence involving --</p> <p>19 MR. HAMILTON: Objection.</p> <p>20 BY MR. HUGHES:</p> <p>21 Q. -- Mr. Furlow, you know, involving, you</p> <p>22 know, when you responded, that another police</p> <p>23 officer responded to claim of assault against a</p> <p>24 female, and the accuser was Mr. -- that the person</p> <p>25 who was being accused of committing the assault</p>	<p style="text-align: right;">Page 172</p> <p>1 MR. HAMILTON: Objection.</p> <p>2 BY MR. HUGHES:</p> <p>3 Q. And you went back how many times, do</p> <p>4 you believe?</p> <p>5 A. I believe at least three.</p> <p>6 Q. Okay. So you went back to the house</p> <p>7 three times so -- and then in addition to that, no</p> <p>8 attorney ever called you up to say will turn himself</p> <p>9 in; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. But according to the allegations in the</p> <p>12 complaint, there is an attorney who apparently was</p> <p>13 aware that Mr. Furlow was wanted on a -- what --</p> <p>14 that there was a wanted issued on Mr. Furlow; is</p> <p>15 that correct?</p> <p>16 MR. HAMILTON: Objection.</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. HUGHES: Okay. Thank you, Officer</p> <p>19 Walsh. I have no other questions.</p> <p>20 MR. HAMILTON: I have -- we requested a</p> <p>21 very, very brief break. I just want to confer with</p> <p>22 my team. If anything, I have just a handful of</p> <p>23 questions. Really nothing. Two minutes, literally.</p> <p>24 THE VIDEOGRAPHER: Time is 1:24. We</p> <p>25 are off the record.</p>

43 (Pages 169 to 172)

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

Page 173

1 (Discussion off the record.)  
2 THE VIDEOGRAPHER: The time is 1:27.  
3 We are back on the record.  
4 FURTHER EXAMINATION  
5 BY MR. HAMILTON:  
6 **Q. Thank you, Detective Walsh. Just a few**  
7 **clean-up questions, if you don't mind.**  
8 **I want to go back to -- to your**  
9 **responding to -- to the incident involving**  
10 **Ms. Furlow.**  
11 **You mentioned the presence of the AR15;**  
12 **is that correct?**  
13 A. Yes.  
14 **Q. And this was -- you said you made the**  
15 **gun safe and you put it into the car that Ms. Furlow**  
16 **was driving away with, right?**  
17 A. Yes.  
18 **Q. Did you inquire any further about the**  
19 **ownership of that car?**  
20 A. The ownership of the car? No.  
21 **Q. Okay. Did you inquire about what was**  
22 **going to happen to that rifle specifically?**  
23 A. She said she was taking it to her  
24 family's house in the city.  
25 **Q. Okay. You also -- you also learned**

Page 174

1 **that Mr. Furlow left with one of their children in**  
2 **the car; is that right?**  
3 A. Yes.  
4 **Q. Did you -- were you concerned about the**  
5 **safety of that child?**  
6 A. Always concerned about a child in a  
7 domestic situation. But Mrs. Furlow didn't really  
8 make any -- any mention of concern over it.  
9 **Q. But in your experience and**  
10 **observation and based on the concern you just**  
11 **mentioned, did you take any steps to ensure that**  
12 **that child was okay?**  
13 A. Attempted to -- when I talked to  
14 Mr. Furlow, I talked to him. And he didn't want to  
15 answer anything.  
16 **Q. And I -- I believe you -- did you take**  
17 **any independent steps to make sure that the child**  
18 **with Mr. Furlow was okay?**  
19 A. No.  
20 **Q. Did you put out an Amber alert?**  
21 A. No.  
22 **Q. And did you ever inquire when you --**  
23 **well, you had occasion to speak to Ms. Furlow the**  
24 **following day; is that correct?**  
25 A. Yes.

Page 175

1 **Q. Did you inquire about the whereabouts**  
2 **of that -- that high-powered rifle?**  
3 A. Yes.  
4 **Q. And what did she say?**  
5 A. She said it was at her family's  
6 house.  
7 **Q. And did she say anything about whether**  
8 **Dwayne had access to it?**  
9 A. She said that he was not around.  
10 **Q. Okay. Did you inquire about her child**  
11 **who was with Mr. Furlow?**  
12 A. I don't know.  
13 **Q. But taking all of this together, you**  
14 **did not feel like you had enough information for a**  
15 **warrant for Mr. Furlow's arrest; is that correct?**  
16 A. No.  
17 **Q. That's not correct?**  
18 A. No.  
19 **Q. Did you immediately take steps to try**  
20 **and sec -- apply for a warrant?**  
21 A. No, not until he was in custody.  
22 **Q. Okay. Even though, as you described,**  
23 **Ms. Furlow was distraught upon your arrival at the**  
24 **scene the day before, correct?**  
25 A. Yes.

Page 176

1 **Q. And despite the presence of the**  
2 **high-powered rifle; is that correct?**  
3 A. Yes.  
4 **Q. And despite knowing that one of the**  
5 **children was with Mr. Furlow; is that correct?**  
6 A. Yes.  
7 MR. HAMILTON: No further questions.  
8 MR. HUGHES: I have no questions.  
9 You have the right to read the  
10 deposition and make changes if -- if the court  
11 reporter made any mistakes, but this is being  
12 televised anyway, and you have the right to change  
13 your testimony but that's, you know --  
14 MR. HAMILTON: It's --  
15 MR. HUGHES: So -- so -- but you have a  
16 right to waive that.  
17 MR. HAMILTON: Objection.  
18 Mike, do you want to say this off the  
19 record? I don't know if this is --  
20 MR. HUGHES: No. Let's keep -- I  
21 recommend you waive signature.  
22 Would you like to waive signature?  
23 THE WITNESS: Yes.  
24 MR. HUGHES: Yes, okay.  
25 THE VIDEOGRAPHER: The time is 2:31.

44 (Pages 173 to 176)

KEVIN WALSH 2/9/2017

Page 177

1 We are off the record. This concludes our  
2 deposition of Kevin Walsh.  
3 (Whereupon, signature was  
4 waived and the witness was  
5 excused at 1:30 p.m.)  
6 --oOo--  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 178

1 CERTIFICATE OF REPORTER  
2  
3 I, RENÉE COMBS QUINBY, a Registered Merit  
4 Reporter, Certified Realtime Reporter, Certified  
5 Shorthand Reporter (CA), Certified Court Reporter  
6 (MO), Realtime Systems Administrator, and Notary  
7 Public within and for the State of Missouri, do  
8 hereby certify that the witness whose testimony  
9 appears in the foregoing deposition was duly sworn  
10 by me to testify to the truth and nothing but the  
11 truth; that the testimony of said witness was taken  
12 by stenographic means by me to the best of my  
13 ability and thereafter reduced to print under my  
14 direction.  
15 I further certify that I am neither  
16 attorney nor counsel nor related nor employed by any  
17 of the parties to the action in which this  
18 deposition was taken; further, that I am not a  
19 relative or employee of any attorney or counsel  
20 employed by the parties hereto or financially  
21 interested in this action.  
22 My Commission expires April 9, 2017  
23  
24 -----  
25 Renée Combs Quinby, RMR, CRR, CCR #1291

45 (Pages 177 to 178)

KEVIN WALSH 2/9/2017

<b>A</b>	<b>accused</b> 119:21 170:25 171:6	<b>afraid</b> 169:14	103:9,21 104:7	38:4 59:7
<b>a.m</b> 1:16 7:11,15	<b>accuser</b> 170:24	<b>afternoon</b> 116:16	<b>Angry</b> 169:14	82:23 96:21
<b>ability</b> 9:17 39:4 54:14 142:24 178:13	<b>achieve</b> 33:6 79:25	<b>age</b> 8:19	<b>annually</b> 17:6	97:3 130:22
<b>able</b> 22:14 71:22 74:2 79:16 80:8 86:3,23 87:17 119:25 125:18,24 142:15	<b>achieved</b> 49:19 136:2	<b>agency</b> 103:6	<b>answer</b> 11:18,19 65:20 84:8 92:24 109:21 127:15 174:15	139:7 142:2
<b>absolutely</b> 111:22	<b>acknowledged</b> 124:16	<b>agitated</b> 161:25	<b>answered</b> 46:19 65:12,13,18 146:10	<b>apply</b> 22:4 81:3 81:11,19,25 125:7 133:20 138:23 139:1 141:19 147:7,7 147:19 175:20
<b>abuser</b> 167:9	<b>act</b> 154:19	<b>agree</b> 62:16,25 64:15,20 103:18 105:7 106:6 110:12 111:1 155:24 167:2,3,18,21	<b>answering</b> 33:16	<b>applying</b> 25:14 94:2 96:5 132:1
<b>academic</b> 26:16 26:16 41:18	<b>action</b> 9:7 178:17,21	<b>agreed</b> 7:2 120:12	<b>anxious</b> 161:25	<b>appreciate</b> 70:20
<b>academics</b> 50:18	<b>active</b> 74:17,18 74:20 88:19,25 89:3 90:1,17 90:21	<b>agreement</b> 7:8	<b>anybody</b> 39:5 49:16 88:10 98:9 100:9 123:11,14 160:25	<b>approached</b> 119:9
<b>Academy</b> 21:11 22:8 24:9 25:15,20 26:2 26:5,13,20,23 26:24 41:17,19 41:25 42:15 44:18 45:20 46:5,11,13,16 46:20 49:16 50:8 68:23 116:2,3	<b>activities</b> 18:15	<b>ahead</b> 79:3 81:3 131:19	<b>anyway</b> 78:16 145:16 176:12	<b>appropriate</b> 51:14,15
<b>accepted</b> 25:15 38:5	<b>actual</b> 41:25 82:5 138:20	<b>ahold</b> 140:23	<b>apologize</b> 10:1 13:23 20:5 30:6 38:18 41:24 55:14 67:16 72:16 73:24 77:9 96:4 118:18 127:15 165:15	<b>approval</b> 66:13 66:16 67:5,14 68:11 75:11,15 78:22 79:7 80:14,19,20 84:4 111:13 112:3,14 113:1 113:24 134:24 135:9,19,24 136:2 168:22 168:25
<b>access</b> 77:4 80:8 175:8	<b>ad</b> 32:17	<b>al</b> 1:5,8 4:5,10 7:17,18	<b>apparently</b> 141:17 172:12	<b>approve</b> 52:15 74:12,23 79:20 80:24 168:25
<b>accident</b> 26:18 42:21	<b>add</b> 164:1	<b>alderman</b> 155:15	<b>appear</b> 77:2 109:14 128:8 149:18	<b>approved</b> 75:1 76:7,14,18 77:1,6,18 112:4 135:7 136:1
<b>accidents</b> 33:18	<b>added</b> 106:21	<b>alert</b> 10:25 156:17,18 174:20	<b>appears</b> 109:13 111:2 178:9	<b>approver</b> 78:2
<b>accomplish</b> 143:1	<b>addition</b> 13:19 52:18 81:15 172:7	<b>allegations</b> 172:11	<b>applicable</b> 46:2	<b>approves</b> 74:16 169:2
<b>account</b> 124:9 128:4,7,13,14 132:22 140:15 161:8	<b>additional</b> 32:3 80:15 106:24 125:24	<b>alleged</b> 116:22 164:15,17	<b>application</b> 3:3 24:23,24 25:6 37:19 38:1 58:4 82:6,9,14 86:12 96:22 130:19 131:15 133:1 137:22 138:22 139:12 142:7	<b>approving</b> 76:3 77:15 78:4 112:7
<b>accurate</b> 10:18 67:1	<b>address</b> 14:13 14:17 118:21 119:1 149:6,12	<b>allow</b> 56:1	<b>applications</b> 57:21 58:20	<b>approximately</b> 7:15
<b>accurately</b> 64:2 64:13 112:9	<b>adjoining</b> 103:10 105:20	<b>alluded</b> 148:14 157:5	<b>applied</b> 24:20	<b>April</b> 178:22
<b>accusations</b> 168:9,11	<b>administered</b> 107:24	<b>Ambulance</b> 151:16		
	<b>Administrator</b> 178:6	<b>amended</b> 164:15		
	<b>advise</b> 72:19 151:17	<b>amendments</b> 107:7		
	<b>advised</b> 117:5 122:2 140:12	<b>Americas</b> 5:12		
	<b>advisement</b> 58:9 58:11 59:1	<b>analysis</b> 82:18 82:24		
	<b>affect</b> 9:17	<b>and/or</b> 22:21		
	<b>aforesaid</b> 8:21			

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<b>AR15</b> 120:17 153:24 155:8 156:6,10 157:1 157:7,12,23 158:7 173:11	<b>asking</b> 9:5 63:24 67:12 71:4 75:4,5 76:17 109:17	178:16,19	122:4 123:4 124:15 127:3 127:10 133:19 134:19 140:22 141:25 142:11 154:1 171:20 171:23 172:3,6 173:3,8	104:21 110:7 <b>bearing</b> 68:19 <b>beat</b> 102:14,17 118:1,2 150:14 150:16,17
<b>AR15s</b> 155:18	<b>aspects</b> 17:11 38:1	51:22 52:3,8 52:12,14 53:14 53:25 55:20 56:10,12 57:9 59:6 125:14	154:1 171:20 171:23 172:3,6 173:3,8	<b>beats</b> 102:15 <b>becoming</b> 37:15 <b>began</b> 25:17 121:5
<b>ArchCity</b> 5:6 8:8	<b>assault</b> 116:22 159:19,20,22 170:23,25	<b>attorneys</b> 8:1 9:6 82:7 144:9	<b>background</b> 20:24 21:5 25:1	<b>beginning</b> 1:16 32:21 36:13 116:7 118:12
<b>area</b> 120:1 146:1	<b>assaulted</b> 117:8 162:20	<b>attribute</b> 10:10	<b>BackStopper</b> 18:11,12	<b>behalf</b> 4:16 58:16
<b>argumentative</b> 109:20	<b>assignments</b> 33:20 34:9	<b>authorization</b> 67:2,19 68:7 75:19	<b>backyard</b> 141:9 <b>based</b> 23:3 44:14,25 45:18 46:4 49:4,21 55:18 66:13,16 67:5,10 68:5 69:18 70:7 76:10,12 82:4 82:8 84:13 85:5,10 89:17 90:2 91:4,12 91:13,21 96:20 99:1 103:6,19 105:17,24 113:14,22,23 116:13,19 122:12 124:19 124:19 126:13 129:2,4,10,12 130:24 131:13 131:23,23 137:7 138:6 139:16,21,21 139:23 174:10	<b>beings</b> 137:23 <b>believable</b> 154:21 <b>believe</b> 12:12 14:6 18:2 19:18 23:25 29:24 30:10,10 31:14 32:3 36:11 37:5,14 41:6 42:24 43:18 44:19 45:24 61:9 64:11 74:7,20 86:6 105:18 123:5 124:4,20 125:23 131:19 132:6,20 141:15 145:15 153:16 154:23 172:4,5 174:16
<b>Arnold</b> 149:2 168:17	<b>assist</b> 34:6	<b>authorize</b> 66:21		<b>believed</b> 17:14 <b>Belmar</b> 1:8 4:10 7:18 8:12 16:1 16:3,24 17:25 18:6
<b>arrest</b> 45:17 82:16,19 84:20 88:11,13,14 122:10,12 125:5 133:4,9 137:25 162:13 175:15	<b>assistance</b> 38:24 <b>assisted</b> 30:17 32:6	<b>authorized</b> 67:11		<b>belonged</b> 121:1 <b>belongings</b> 155:7
<b>arrested</b> 86:10 93:7 94:18 126:16,19 127:5,11 136:6 136:8 139:15 140:10 142:22	<b>assists</b> 29:8	<b>Avenue</b> 5:12 6:4 118:23 149:10		<b>benefit</b> 107:4 <b>best</b> 10:12 28:5 28:5 178:12
<b>arresting</b> 87:19 92:5,13	<b>associated</b> 64:8	<b>aware</b> 28:10,11 40:14 41:9 57:5 65:22,25 66:23 69:25 70:1,2,12 75:9 78:4 80:18,22 85:8 97:17,24 97:25 108:2,10 108:11 112:19 130:9 140:1 155:22 172:13		<b>better</b> 12:21 <b>big</b> 23:14 42:23
<b>arrival</b> 175:23	<b>Association</b> 27:15	<b>awareness</b> 98:3		
<b>arrive</b> 152:10 168:9	<b>assortment</b> 18:18			
<b>arrived</b> 93:21 117:3 119:7,8 119:15 152:11 152:12,19	<b>assume</b> 9:12 169:17,23	<b>B</b>		
<b>arriving</b> 71:1 119:4	<b>assuming</b> 78:13	<b>B</b> 102:7 105:12 110:25 111:2 159:19		
<b>Aside</b> 40:14	<b>attached</b> 3:5 141:17	<b>B-r-a-n-n-a-n</b> 40:10		
<b>asked</b> 12:24 13:12 41:24 53:20 65:17 99:21 120:18 137:4 140:16 146:10,11,12 146:22 160:25 161:2 162:12 169:25 170:7	<b>attacking</b> 141:17	<b>bachelor's</b> 21:9 <b>back</b> 11:1 21:12 26:19 28:8 43:7 47:9 59:13,23 70:21 84:1 86:22 87:23 88:4 114:13 115:21 115:21 120:11 120:11 121:11		
	<b>attempt</b> 127:25 130:6 132:5,9 132:14			
	<b>attempted</b> 125:15 174:13			
	<b>attempting</b> 166:7			
	<b>attempts</b> 71:16 71:18,20			
	<b>attend</b> 50:12			
	<b>attention</b> 102:6 115:2 128:21 142:16			
	<b>attorney</b> 13:5 137:21 161:9 164:17,18,21 169:18 170:1 172:8,12			

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

<b>bill</b> 155:18	<b>businesses</b> 80:7	141:6 148:12	84:14,16,25	178:25
<b>bit</b> 10:11 26:20	<b>busy</b> 34:4	<b>campus</b> 26:7	85:3,9 86:2,6	<b>center</b> 101:21
33:9 41:14,15	<b>button</b> 61:15,16	<b>cancel</b> 88:22	88:6 90:10	<b>Central</b> 6:4
43:10 46:19	<b>C</b>	91:11 107:6	91:21 96:21	<b>certain</b> 27:16
48:19 49:6,25	<b>C</b> 5:3 7:11 103:1	136:22	102:10,12,18	28:2,3,17,24
60:5,7,7 61:12	104:4	<b>canceled</b> 91:15	102:20,23	39:2 44:6
69:10 82:17	<b>CA</b> 4:21 6:15	137:10 138:9	103:3,7,16,19	46:25 49:17
101:3,4,6	178:5	<b>capacity</b> 8:13	104:5,8,15	57:19 61:16
102:25 115:18	<b>CAD</b> 3:2 14:3,5	<b>capture</b> 10:10	105:17 106:12	79:16 80:7
125:10 128:17	14:9 15:8	119:14	106:14,15	82:5,8 86:25
137:6 142:25	118:7 148:12	<b>captures</b> 57:6	111:8,11,24	86:25 89:21
143:22 154:3	168:16	69:5 97:11	112:2,5,13	107:20 143:24
<b>black</b> 151:3	<b>Cadillac</b> 151:3,6	<b>car</b> 18:17 34:6	113:8 138:17	<b>CERTIFICA...</b>
<b>Blake</b> 5:6 8:8	<b>call</b> 3:2 29:7	40:22,23,24	138:20 141:22	178:1
<b>blank</b> 89:19	34:17 38:16	90:10,14	170:18	<b>Certified</b> 4:19
<b>blocks</b> 44:6	40:5,21 41:7	121:11 123:4	<b>cases</b> 39:2 66:14	4:20,21 7:5
<b>board</b> 25:2	70:22,23,24	144:23 159:5	66:17 76:6	178:4,4,5
<b>bold</b> 106:3 111:1	72:25 73:18	173:15,19,20	86:19,20 87:13	<b>certify</b> 178:8,15
111:5 112:12	90:16 92:17	174:2	94:5 126:21,25	<b>Challenging</b>
<b>books</b> 47:13	93:5 102:17	<b>care</b> 37:10 49:1	147:19 164:14	12:5
<b>bottom</b> 62:25	116:21,25	66:22 72:19	166:14	<b>chamber</b> 155:13
107:14,19	117:2,2,5,6,7	73:1,1,2 74:15	<b>categories</b> 96:3	<b>chamilton@p...</b>
108:23 109:7	117:25 119:1	74:19 77:4	96:4	5:15
134:20 136:5	123:12,15	84:3 88:22	<b>category</b> 50:2	<b>change</b> 38:9,13
<b>boxes</b> 159:5	124:12 130:7	89:18 91:8,9	58:19,21,24	66:23 68:14
<b>Boxing</b> 18:17	136:7,10	91:11 106:16	<b>cause</b> 45:17,22	176:12
<b>brain</b> 125:10	140:10 143:7	112:5,8 113:11	48:23,24 49:3	<b>changed</b> 67:7
<b>Brannan</b> 40:8,9	149:14,25	123:5,6 135:15	49:12,19 51:3	98:22
40:10	163:3,3 168:2	135:17,19,23	51:18 64:10,18	<b>changes</b> 9:20
<b>break</b> 11:4,7,11	168:10 170:1	137:21 168:24	64:22,25 65:3	24:2 98:16
59:13 94:6	<b>called</b> 61:9 71:5	168:25 169:2	65:8 66:14,17	99:1 100:11
172:21	71:7 123:8	<b>CARE/Records</b>	67:5,10 69:16	176:10
<b>brief</b> 172:21	141:7,12 152:5	103:4	70:8 72:9,13	<b>changing</b> 98:18
<b>briefly</b> 14:8	172:8	<b>carried</b> 159:11	74:11 79:25	<b>characterizing</b>
<b>bring</b> 80:16 87:2	<b>caller</b> 148:24	<b>carry</b> 159:5	83:2 85:6,11	96:24
146:24,24	149:1,3,7	<b>cars</b> 34:23,24	86:8 92:11	<b>charge</b> 154:6
<b>broken</b> 102:15	152:2,7,14	<b>carve-out</b> 86:24	105:17 106:13	159:21
<b>Brothers</b> 21:15	168:15	<b>case</b> 1:7 4:9 7:18	109:13,25	<b>charged</b> 160:2
<b>bruises</b> 128:20	<b>calling</b> 73:7	8:21 11:23	111:9,25	160:10
<b>bstrode@arch...</b>	150:16	12:1,4 13:17	113:10 122:12	<b>charges</b> 72:21
5:8	<b>calls</b> 14:3,10	14:16,20 19:12	125:4 129:2,6	80:5,16 121:12
<b>Building</b> 23:9	19:7,9,17	27:25 28:1	129:9,18 131:4	<b>charging</b> 159:20
<b>Bureau</b> 40:20	33:16,17,18	29:6 38:25	131:4 134:12	<b>charity</b> 18:13,18
41:7	34:15 38:23	40:14 48:25	162:13 169:1	<b>Charles</b> 5:11 8:3
<b>burglary</b> 120:20	46:24,25	54:14 60:10	<b>caused</b> 65:24	9:4 145:14
<b>business</b> 33:22	103:23 109:18	68:10 71:15	<b>caveat</b> 86:25	<b>chasing</b> 141:17
33:22		76:4 83:2,14	<b>CCR</b> 6:16	<b>check</b> 84:17,19

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

90:5,7 111:1 120:25 <b>check-in</b> 17:3 32:14,16 <b>checking</b> 31:1 89:1 <b>checkpoints</b> 107:20 <b>checks</b> 32:8 33:22,23 <b>chief</b> 8:12 16:1,3 16:4,17,24 17:25 18:6 <b>child</b> 174:5,6,12 174:17 175:10 <b>children</b> 141:8 141:17 155:4 162:7 174:1 176:5 <b>choose</b> 18:24 126:4 <b>chose</b> 19:1 <b>Chris</b> 8:12 <b>Christian</b> 21:15 149:21 <b>Christmas</b> 16:21 18:10 <b>Christopher</b> 15:24 <b>chronologically</b> 24:15 <b>circumstances</b> 132:25 <b>city</b> 4:18 121:5 144:11,17,19 144:24 146:1,8 155:15,19 173:24 <b>civil</b> 99:9,9,14 <b>civilian</b> 135:12 <b>claim</b> 170:23 <b>clarify</b> 13:24 15:12 53:22 55:5 81:5 112:22 <b>class</b> 42:23,25 43:2,4 160:8	160:10 <b>classes</b> 45:9 <b>classroom</b> 41:18 42:3,6,15,17 43:8 47:3,13 47:15 <b>Clayton</b> 6:5 73:4 90:25 92:21 <b>clean-up</b> 173:7 <b>clear</b> 15:7 53:7 56:7 67:21,23 69:18 77:7 84:23 85:17 86:4 94:17 129:17 130:5 134:10 <b>cleared</b> 117:1 <b>Clements</b> 8:12 15:21 <b>clerk</b> 103:4 168:25 <b>close</b> 34:6 60:1 68:22 73:17 93:21 100:9,17 110:3 114:2 143:7 <b>closely</b> 35:25 <b>closer</b> 35:19 105:13 117:18 <b>Clothes</b> 130:1 <b>clothing</b> 121:7 159:5 <b>clues</b> 124:8 <b>coaching</b> 46:24 <b>cocounsel</b> 8:6 <b>code</b> 23:10 <b>coercing</b> 160:25 <b>colleague</b> 8:5 <b>colleagues</b> 69:22 99:22 <b>collect</b> 15:4 <b>collected</b> 15:17 <b>college</b> 21:16,25 22:12,13 <b>Combs</b> 4:19 6:15 7:5 178:3 178:25	<b>come</b> 22:4 26:19 41:5 48:18,22 59:13 70:21,23 70:24 78:22 79:7 85:25 94:12 106:24 107:12 117:25 120:11 121:18 126:7 127:10 133:18 140:12 154:1 162:2 <b>comes</b> 38:18 69:1 127:3,3 <b>comfortable</b> 132:1 <b>coming</b> 21:6 42:22 100:21 117:4,21 <b>commander</b> 90:23 <b>commence</b> 113:8 <b>commencing</b> 112:19 <b>Commission</b> 178:22 <b>committed</b> 45:25 49:10,13 64:11 82:6 83:3 106:14 111:10,25 <b>committing</b> 170:25 <b>common</b> 127:2 <b>communicate</b> 14:23 <b>communicated</b> 14:15,19 <b>communication</b> 14:22 <b>communicatio...</b> 19:11 33:17 <b>communities</b> 99:13 <b>community</b> 82:21 100:13 100:15	<b>commute</b> 26:7 <b>commuted</b> 26:11 <b>compare</b> 25:5 <b>comparison</b> 106:5 <b>compassion</b> 155:2 <b>complain</b> 141:7 <b>complaint</b> 12:6 12:10 13:4 14:1 40:20 114:19 164:15 170:9 172:12 <b>complete</b> 10:19 10:24 11:1,10 128:14 <b>completed</b> 26:24 32:22 46:13 57:21 <b>completely</b> 155:18 <b>completion</b> 27:20 28:19 <b>components</b> 49:18 <b>comprehensive</b> 25:11 26:15 <b>comprehensiv...</b> 30:18 <b>computer</b> 77:4 90:8,9,13 <b>Computer-aut...</b> 14:6 <b>concern</b> 155:2 162:2,6 174:8 174:10 <b>concerned</b> 174:4 174:6 <b>concludes</b> 177:1 <b>condition</b> 9:16 <b>conduct</b> 40:15 41:9 52:24 55:2 69:14 70:10 84:19 85:12,16 86:3 86:14,17,23	87:2,18 90:7 92:3,21 93:15 104:13 125:19 137:15,19 138:1,22 147:12 <b>conducted</b> 54:9 82:7 86:10 137:9 <b>conducting</b> 87:24 90:4 108:3 <b>confer</b> 172:21 <b>confirm</b> 12:18 103:2 111:7 <b>conflict</b> 112:18 <b>conflicting</b> 143:22 <b>Confused</b> 20:19 <b>confusing</b> 9:11 <b>conjecture</b> 103:24 109:18 <b>connection</b> 11:23 144:3 <b>consent</b> 7:8 <b>consequences</b> 108:9 <b>consist</b> 46:18,22 71:3 <b>consisted</b> 46:23 48:15 66:11 <b>Constitutional</b> 42:20 43:13,15 43:19 44:3 99:11 <b>consult</b> 123:11 123:14 <b>contact</b> 13:3 71:2,3,9,11,16 71:20,22 72:12 72:19 76:1 79:16 88:10,17 88:22 90:23 91:8,10,18 106:16 112:5 113:11 123:6 <b>contacted</b> 12:25
---	--	---	---	---

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

92:19 122:6 123:5 127:23 136:12 137:3 <b>contacts</b> 33:22 105:21 <b>contain</b> 64:22 <b>contained</b> 106:7 <b>contains</b> 106:3 <b>content</b> 79:13 <b>context</b> 45:7 46:20 124:8 <b>continue</b> 32:13 92:8 97:2 153:1 <b>contracts</b> 60:20 <b>controls</b> 102:13 <b>conversation</b> 17:5,8,18,19 18:1,3 26:21 47:25 48:1 73:10,13,16 76:3,20,24 78:8,12 79:2,9 79:14 81:7,10 84:3 91:19 112:20 122:17 131:14 135:2,4 135:5 139:14 <b>conversations</b> 16:15,24 32:14 48:14 52:13 55:19 56:9,14 66:5,11 69:19 78:20 79:13 80:12 81:1 98:10,13 99:16 99:21,22,23 100:14,16,25 <b>Conveyance</b> 103:9 <b>convicted</b> 154:2 157:18,22 158:8 <b>cooperation</b> 58:10 59:8 <b>coordinated</b> 62:24	<b>cop</b> 165:14 <b>copied</b> 3:5 <b>copies</b> 3:5 <b>copy</b> 62:5,13,14 101:16 115:8 <b>corner</b> 136:5 <b>correct</b> 10:10,11 15:11 20:8,11 22:9 26:25 29:5 30:11,19 46:8 48:20 54:25 56:24 62:17 63:7,10 69:11 77:2 83:7,13 84:25 95:20 96:11 106:11 110:1 112:13,17 113:3,12,22 115:24 116:7 116:11,12 118:23 126:16 127:12 130:20 130:23 131:2 131:16,21 133:2 144:13 144:14,17,25 145:4,11,20,23 145:25 146:1,4 147:9,24 148:18,21,24 149:4,5,7,12 149:25 150:3 150:18 151:20 152:8,15 154:8 156:22 158:14 159:6,23 160:11,17 162:15,20,23 163:4,10,12,17 164:5,9 165:12 165:19,22 166:19,22 167:9,14 168:5 168:17 169:8 170:9,15 171:7 171:14,18,24	172:9,15 173:12 174:24 175:15,17,24 176:2,5 <b>Corrections</b> 22:8 <b>correctly</b> 50:3 55:17 79:20 80:11 90:18 103:2,13 106:18 111:8 128:23 143:18 <b>counsel</b> 7:3,3,8 123:23 127:19 164:23 178:16 178:19 <b>Counseled</b> 155:3 <b>Counselor's</b> 6:3 <b>counties</b> 103:10 105:20 145:18 <b>country</b> 70:15 157:25 <b>county</b> 3:2 6:3 8:13 16:18 18:7 21:10 24:8,17 25:3 26:2 27:3 28:2 33:17 40:1,1 47:5 50:8,14 60:20 65:7 66:22 69:20 70:6,13 73:5 88:17,22 90:2 93:10 95:1,2,4 95:5 98:19 99:1,24 100:12 101:5 114:17 115:13 116:20 117:5,13 144:4 144:5,11,12,12 144:13,15,16 144:19 145:3 145:14,22 155:17 <b>county/city</b> 23:10	<b>couple</b> 9:25 10:7 98:22 136:3 140:9 150:21 <b>course</b> 9:21 10:21 23:21 26:14 48:2 49:15 51:13 53:19,23 81:1 81:9 <b>court</b> 1:1 3:4 4:1 4:20 6:14 7:6 7:19 8:15 10:5 10:17 12:7 89:22 143:25 176:10 178:5 <b>courts</b> 98:5 <b>cover</b> 10:1 42:18 44:15 62:21 69:3 <b>covered</b> 42:19 77:8 133:16 167:25 <b>covering</b> 50:24 51:2 <b>cramp</b> 125:10 <b>create</b> 113:25 <b>created</b> 57:14 73:19 77:11 78:10,22 79:8 79:9 80:24 84:2 <b>creating</b> 70:19 <b>creation</b> 72:18 74:9,23 75:11 75:14 76:18 <b>crime</b> 45:25 49:10,13 56:2 64:11 82:5 83:3 106:14 111:10 112:1 123:21 127:8 129:8 <b>crimes</b> 22:21 87:1 161:6 <b>criminal</b> 21:20 42:19,20 <b>criteria</b> 27:16,19	<b>CRR</b> 6:15 178:25 <b>crunch</b> 114:6 <b>crying</b> 152:2,7 152:14,20,21 152:25 153:5,5 153:9 154:15 162:23 163:2 164:3 169:14 <b>CSR</b> 6:15 <b>current</b> 113:23 <b>currently</b> 110:20 <b>custody</b> 51:20 54:8 82:4 83:8 83:10 84:15,21 85:5,9,13,18 86:4,15,18 87:2,25 88:10 91:9,13,22 93:24 94:3 95:12,19 96:9 96:13,22 97:3 126:13 146:24 146:25 164:20 175:21 <b>cutting</b> 141:8 <hr/> <b>D</b> <hr/> <b>D</b> 7:11 <b>damaged</b> 141:10 <b>danger</b> 133:17 153:17 <b>dangerous</b> 34:8 153:17 155:25 156:19 <b>database</b> 15:18 <b>date</b> 7:14 63:1,2 63:6 68:16 89:22 118:16 137:2 140:9 143:25 <b>date/time</b> 118:9 134:21 <b>daughter</b> 151:24 <b>David</b> 6:10 7:24 <b>day</b> 25:8,9 33:14
--	--	--	--	--

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

42:8,10 59:14	2:23 110:7	<b>deposed</b> 10:2	39:5,8,15,25	137:7 146:3
79:10 93:2	<b>DEF RFP4000...</b>	12:15	40:8 62:17,20	155:16 160:2,3
116:14,17	2:13 61:22	<b>deposes</b> 8:21	64:15 82:25	161:23
132:16 134:25	<b>degree</b> 21:9	<b>deposition</b> 1:11	101:17 110:12	<b>dig</b> 69:10
135:8 160:16	<b>degrees</b> 22:13	4:14 7:4,16,21	115:9 141:25	<b>diploma</b> 21:9
161:11 168:24	<b>delegating</b>	9:21 10:22	173:6	<b>direct</b> 102:6
174:24 175:24	104:11	13:2,12 15:16	<b>detectives</b> 39:1	115:1
<b>day-to-day</b>	<b>delivered</b> 92:6	145:10 169:17	69:20	<b>direction</b> 151:11
33:10	<b>demeanor</b> 17:13	170:8 176:10	<b>determination</b>	178:14
<b>days</b> 34:4	129:11 132:22	177:2 178:9,18	49:3 65:4	<b>directly</b> 16:7,11
132:17 135:10	161:18	<b>describe</b> 14:8	71:13 72:13	<b>disadvantage</b>
140:9,15 143:4	<b>demotion</b> 40:11	17:2 41:15	82:19 83:1	34:7
<b>DCI</b> 106:16	<b>denial</b> 58:12	82:2 86:15	89:25 90:3	<b>discretion</b> 18:24
112:5	<b>denials</b> 58:8,22	90:17 98:2	113:10 122:23	32:18,18 33:21
<b>dealing</b> 154:4	58:24	152:17,23	124:10 129:6	77:13 96:20
162:8	<b>denied</b> 58:5,20	158:5	129:13,18	<b>discuss</b> 13:17
<b>dealt</b> 168:16	59:7 108:25	<b>described</b> 33:25	131:6,8 133:17	16:17 17:9,12
<b>decide</b> 146:23	133:2	89:14 95:11	<b>determinations</b>	48:10
<b>decided</b> 24:16	<b>deny</b> 163:19	96:2 99:17	51:3	<b>discussed</b> 48:4
<b>decision</b> 113:5	164:8	113:5 123:8	<b>determine</b> 33:25	56:19 105:9
<b>dedicate</b> 34:1	<b>departed</b> 151:24	124:20 126:19	39:1 45:16	106:25 123:7
<b>deemed</b> 102:18	<b>department</b>	126:24 128:8	54:23 74:11	<b>discusses</b> 87:10
<b>DEF-SUPP00...</b>	2:18,20,22	137:7 175:22	90:16 91:5	<b>discussing</b> 98:25
2:17 62:8	14:16,20 16:5	<b>description</b>	127:25 161:9	100:16
<b>defendant</b> 12:1	17:14,16 18:7	61:13 152:18	<b>determined</b>	<b>discussion</b> 107:7
12:1 20:17	22:7 27:14,17	<b>designate</b> 68:11	40:22,23 45:16	113:3 173:1
<b>Defendant's</b>	43:23 50:15	<b>designated</b>	48:23,24 49:9	<b>disheveled</b>
148:6,10	65:7 69:21	28:21 103:20	51:19,22 52:4	130:1
<b>defendants</b> 1:9	88:18 89:2	<b>designation</b>	58:18 69:16	<b>Dispatch</b> 98:8
4:11 6:1 7:4	90:16 93:11	12:21 62:18	70:9 72:10	117:5
19:22 20:3	97:18,19 98:10	67:14,18	90:20 91:3	<b>dispatched</b>
<b>Defenders</b> 5:6	98:20,25 99:2	<b>designee</b> 111:12	106:13 111:9	33:16
8:9	99:25 101:6	112:3	111:24 122:13	<b>dispatcher</b>
<b>defined</b> 45:22	105:6 107:10	<b>desired</b> 103:4	<b>determines</b>	148:15,17
<b>definition</b> 45:19	110:13,16,20	<b>desk</b> 136:12	49:12 105:22	149:17,18,23
46:1 64:16,21	114:18 135:18	137:23	<b>determining</b>	149:24 150:10
64:25 66:2	139:20 144:5	<b>despite</b> 132:24	71:6	152:14
69:24	149:19 150:1,5	176:1,4	<b>developed</b> 56:10	<b>dispatching</b>
<b>definitions</b>	164:23 165:3	<b>destruction</b>	56:22	14:7
65:16	165:12	19:18	<b>difference</b> 46:5	<b>distinction</b>
<b>DEF RFP1000...</b>	<b>Departmental</b>	<b>detail</b> 41:15	<b>different</b> 39:13	45:13,14
2:25 115:3	102:1 105:6	115:19 152:17	41:19,20 48:10	<b>distinguishing</b>
<b>DEF RFP2340...</b>	<b>depended</b> 34:3	<b>details</b> 118:7	65:16 66:2	44:20 70:12
2:19 101:10	<b>depending</b>	<b>detained</b> 103:6	70:13,17 71:15	<b>distraught</b>
<b>DEF RFP2340...</b>	34:17 48:25	<b>detective</b> 15:20	89:16 90:4	152:2,7,14,20
2:21 104:21	102:14	33:5,7 37:16	100:25 101:1	152:22,23
<b>DEF RFP2340...</b>	<b>depends</b> 92:18	38:6,8,14,18	127:8 134:11	153:12 154:15

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

162:23 164:4 175:23 <b>distress</b> 154:24 <b>distressed</b> 164:3 <b>District</b> 1:1,2 4:1,2 7:19,20 <b>disturbance</b> 99:9,14 125:6 159:22 <b>disturbances</b> 19:19 34:22 <b>dive</b> 101:6 <b>divide</b> 31:21 <b>divided</b> 35:21 <b>division</b> 1:3 4:3 19:19 39:24 <b>document</b> 2:11 2:14 3:1 61:21 61:22 62:7 63:9 65:1 101:8,9,18,21 104:20 105:3 110:6 115:10 115:18 118:6 <b>documentation</b> 17:23 <b>documents</b> 13:19,21,25 15:4,9,14 63:1 115:2 <b>Doe</b> 73:7 74:1 <b>Doell</b> 6:10 7:24 <b>dog</b> 141:16 <b>doing</b> 70:20 99:13 116:2 142:19 153:9 153:13 154:14 165:21 <b>domestic</b> 42:21 86:19 87:13 94:5 96:2,6 97:8,9 117:6 120:19 125:5,5 126:20,24 139:22,23 141:22 142:8,9 142:13 143:9	147:18 153:21 154:6 159:21 159:22 160:1 164:14 165:7 166:14 167:9 174:7 <b>domestics</b> 33:19 34:22 87:9 125:13 161:5 162:8 <b>door</b> 120:12 <b>doorway</b> 119:25 <b>double</b> 120:11 <b>Downtown</b> 23:5 <b>dragging</b> 119:24 <b>drive</b> 23:12 <b>driving</b> 144:23 151:6 153:3,4 153:5 173:16 <b>drug</b> 22:23 82:16,19 <b>DSN</b> 112:7 <b>DSN4068</b> 137:4 <b>DTS</b> 151:3,7 <b>duly</b> 8:19 178:9 <b>duplicative</b> 10:2 <b>duration</b> 29:19 <b>duty</b> 92:19,22 92:23 <b>Dwayne</b> 1:5 4:5 9:7 19:3 119:20 120:20 122:1 151:3 153:25 154:1 157:13 175:8	21:7 <b>educational</b> 21:4,14 <b>effect</b> 102:4 110:21 <b>efficiency</b> 9:23 62:6 <b>egrossman@p...</b> 5:14 <b>eight</b> 42:13 152:13,19 <b>eight-hour</b> 42:10 <b>Eilermann</b> 135:11 <b>either</b> 19:21 20:13 39:2 84:4 90:10 92:9 126:15,20 <b>elaborate</b> 128:9 <b>electronic</b> 45:4 <b>Elizabeth</b> 5:10 8:5 <b>email</b> 14:12,17 15:2,17 41:6 <b>Emerson</b> 43:22 43:24 <b>emotion</b> 153:22 <b>emotional</b> 167:4 <b>employ</b> 144:20 <b>employed</b> 50:14 143:3 178:16 178:20 <b>employee</b> 135:12 178:19 <b>employment</b> 22:25 24:7 <b>employs</b> 144:6 <b>empowered</b> 142:25 <b>empty</b> 155:9 <b>EMS</b> 149:22,25 150:4 <b>en</b> 151:17 <b>encounter</b> 36:24 85:3 88:6 90:12 140:5	141:1 <b>encountered</b> 74:22 84:12 86:1,9 87:17 89:6 <b>encounters</b> 19:16 74:1 84:9 140:7 141:5 <b>ended</b> 24:7 122:17 <b>enforced</b> 143:10 <b>enforcement</b> 2:15 18:14 60:16 64:9 98:4 100:12 103:6 <b>engage</b> 166:18 <b>enrolled</b> 24:8 <b>enrollment</b> 25:20 <b>ensure</b> 88:24 107:11 174:11 <b>entail</b> 22:18 36:19,22 50:17 50:18 98:13 99:10 <b>entailed</b> 26:13 36:20 138:3 <b>entails</b> 55:4,23 61:14 <b>entered</b> 126:11 134:21,21 <b>entering</b> 64:9,12 <b>entertain</b> 131:11 <b>entertained</b> 130:25 <b>entire</b> 111:6 <b>entirety</b> 129:18 <b>entitled</b> 2:12,15 3:1 <b>entity</b> 149:19 <b>entries</b> 102:11 103:5 106:15 112:4 148:17 148:20 150:21 <b>entry</b> 2:12,16	62:21 76:8 102:21 103:7 106:17 112:6 112:15 113:1 150:10 <b>equal</b> 29:18 <b>Esq</b> 5:6,10,10,11 5:11 6:2 <b>essentially</b> 80:13 <b>established</b> 86:8 131:4 <b>et</b> 1:5,8 4:5,10 7:17,18 <b>ethics</b> 42:19 <b>evaluation</b> 17:20 29:12 <b>evaluations</b> 32:14,16 44:2 44:3 <b>event</b> 18:11,12 <b>events</b> 16:18,20 18:15,22 65:22 65:25 80:9 99:6,16,23 114:19,21,23 128:7 140:15 <b>eventually</b> 132:7 <b>everybody</b> 43:4 50:14 70:16 100:5 115:1 <b>exact</b> 68:16 87:10 140:9 <b>exactly</b> 135:1 <b>exam</b> 22:6 <b>EXAMINATI...</b> 2:5,6,7 8:25 143:15 173:4 <b>examined</b> 4:15 <b>example</b> 144:10 144:23 146:20 <b>excluding</b> 78:14 <b>excuse</b> 20:1 24:12 26:10 30:6 62:16 79:5 98:17 125:20 <b>excused</b> 177:5
---	---	---	--	--

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<b>exhibit</b> 2:11,14 2:18,20,22,24 3:1 61:25 62:1 62:10,11 63:6 63:9,21 64:4 64:16,21 65:1 101:11,12 104:22,23 105:8 106:5,7 106:8 110:8,9 110:16 115:3,4 115:7 148:6,7 148:10 164:17 168:1,1 <b>exhibits</b> 2:10 3:4 65:23 <b>exigency</b> 143:6 <b>exist</b> 49:13 166:14 <b>existence</b> 74:11 <b>existing</b> 109:13 <b>exists</b> 45:17 83:3 87:8 106:13 111:9,25 <b>expected</b> 93:5 93:14 <b>experience</b> 22:3 75:14 78:21 83:14 85:15 88:2 107:5 123:18 131:12 131:23 132:24 137:9 144:22 174:9 <b>experiences</b> 21:14 <b>expiration</b> 147:20 <b>expires</b> 178:22 <b>explain</b> 135:13 156:5 <b>explained</b> 45:23 56:21 125:2 163:11 <b>expletives</b> 122:20 136:17 <b>explicitly</b> 106:25	<b>extradited</b> 103:11 <b>extradition</b> 103:4 <hr/> <b>F</b> <b>F</b> 128:21 <b>F.'s</b> 128:20 <b>face-to-face</b> 16:12 55:4,23 93:22 <b>facets</b> 29:8 <b>fact</b> 46:6 52:19 83:20 84:19 89:2 122:3 158:4,20 171:21 <b>factors</b> 34:19 49:18 70:13 82:23 91:4 124:9 132:25 <b>facts</b> 49:4,7,11 49:23 54:13 66:14,17 73:9 76:10,12 82:5 82:9,11 104:16 105:22 111:11 112:1 126:13 <b>factual</b> 71:12 <b>fair</b> 15:1 20:22 38:17 40:5 42:14 105:25 145:17 147:1 168:11 169:1 <b>familiar</b> 15:20 15:23 16:1 60:12 84:14,24 85:2 86:2 88:6 88:15 90:15 102:22 105:3 114:22 118:25 147:14 <b>familiarity</b> 103:17,19 104:11,16 <b>family</b> 19:20 22:22 49:8	100:9,17 121:5 <b>family's</b> 173:24 175:5 <b>far</b> 47:10 51:8 80:15 95:3 117:21 146:7,9 <b>farthest</b> 23:13 <b>fast-paced</b> 161:24 <b>fault</b> 53:9 <b>favor</b> 34:20 <b>fear</b> 142:18 153:25 <b>fearful</b> 169:14 <b>February</b> 1:13 4:15 7:14 19:12 <b>federal</b> 158:10 158:13,17,21 <b>feel</b> 10:25 132:1 142:25 175:14 <b>fellow</b> 66:8 <b>felon</b> 154:2 157:19 158:8 <b>felonies</b> 86:20 <b>felons</b> 157:22 <b>felony</b> 22:20,21 87:14 160:8,11 <b>female</b> 117:6,7 170:24 171:1,7 <b>fence</b> 141:10 <b>Ferguson</b> 97:19 99:6 100:1 <b>field</b> 27:20,22,23 28:12,20,21 29:1,7,12 30:18,22,25 31:4,5,7,20 32:5 36:7,9,17 46:17,18,22 47:6,10,12,22 48:2,11 49:16 68:24 <b>fight</b> 34:22 <b>figure</b> 63:14,17 133:15,21 <b>file</b> 17:23 28:1,1	155:17 <b>filed</b> 12:7 19:12 40:21 <b>files</b> 15:5 <b>fill</b> 89:19 <b>final</b> 50:1,1 135:9,19,23 136:2 138:16 168:22,24 <b>finally</b> 121:22 <b>financially</b> 178:20 <b>find</b> 28:4 41:4 76:6,25 88:8 90:14 130:6 166:25 <b>fine</b> 59:14,16 <b>fingers</b> 74:6 <b>finished</b> 30:16 31:19 32:4 <b>fire</b> 149:21 150:1,5 <b>firearm</b> 120:24 120:25 121:1 <b>firearms</b> 50:19 <b>first</b> 8:19 10:4 18:14 29:22 31:22 41:5 62:23 63:22 71:24 75:2 94:19 95:8 105:3 116:20 117:19 136:13 140:8,19 141:1 143:17 149:19 150:23 161:2 162:10,14 164:15 <b>fitness</b> 25:1 42:12 <b>five</b> 19:10 29:22 31:22 59:14 73:14,15,25 108:24 147:23 <b>five-minute</b> 73:16 <b>flee</b> 105:19	120:1 <b>fleeing</b> 105:24 <b>flip</b> 136:3 <b>Floor</b> 6:4 <b>fluctuate</b> 36:2 <b>flustered</b> 117:9 <b>folks</b> 56:16 99:24 <b>follow</b> 56:23 57:2 89:24 132:9,15 146:16 <b>follow-ups</b> 138:21 <b>followed</b> 63:2 100:2 105:8 125:16 130:14 164:23 165:3 <b>following</b> 46:16 94:9 95:13 98:19 113:15 125:12 133:23 139:14 174:24 <b>follows</b> 8:23 64:6 103:1 <b>force</b> 24:13,17 27:4 28:25 117:15 <b>forced</b> 140:17 <b>foregoing</b> 178:9 <b>forgot</b> 10:24 <b>form</b> 67:24 78:16 83:20 87:25 95:24 103:22 109:16 131:17 146:5 146:15,18 147:4 154:9 155:20 156:2 156:12,20 157:2 <b>formal</b> 47:3 54:9 54:11,17,19 55:2,3,22,22 69:14,15 70:10 83:12 85:12,16 86:3,14,17,23
---	--	--	---	---

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

87:3,18,24	140:5,11,18,21	2:22 14:20	142:11 148:3	<b>graduating</b>
93:15 94:9	140:23 141:1	17:15 35:5,6	150:6 167:24	21:24
95:13 96:10	141:20 149:4	47:18,19,21	173:8	<b>Grames</b> 43:15
125:14,19	150:16 152:7	51:8 60:9	<b>goes</b> 29:7 66:21	<b>Great</b> 91:25
130:15,24	153:24 156:5	68:17 71:7	73:9,21 75:21	101:2 102:2
132:4,5 134:15	159:21 160:10	87:9 100:13	82:18,24 109:5	110:23 115:15
138:1,3	162:13,14	101:4 102:1,3	153:22 168:8	<b>Grossman</b> 5:10
<b>formalized</b>	163:9,11 164:3	105:6 106:21	<b>going</b> 10:1,3,11	8:5
47:24	164:7,18,19	106:24 107:4,6	10:12 11:22	<b>ground</b> 9:25
<b>formally</b> 56:1	165:25 166:5,8	107:12,14,16	21:5 26:20	119:23 133:15
<b>forth</b> 124:16	168:9 169:8,18	108:3 109:4,7	28:8 31:13	<b>group</b> 39:10
<b>four</b> 29:17,23	170:21 171:1	109:14 110:13	33:25 34:1,20	98:24
30:8,14,16	171:18,21,24	110:16,20	34:21 47:12	<b>grow</b> 17:17
32:1 50:4	172:13,14	114:17 125:12	59:12 60:6,11	<b>grown</b> 143:8
<b>fourth</b> 29:24	173:10,15	129:20	61:21,24 62:4	<b>guess</b> 33:10,13
32:2	174:1,7,14,18	<b>gentleman's</b>	62:7,9 63:21	52:16 87:22
<b>free</b> 10:25	174:23 175:11	141:9	64:4,5 65:11	90:3 92:18
<b>frequently</b> 42:6	175:23 176:5	<b>getting</b> 143:21	73:23 86:22	93:1 96:2
44:2	<b>Furlow's</b> 124:13	<b>give</b> 22:14 23:11	90:21 91:7,23	102:25 103:1
<b>friends</b> 49:9	128:1,4 130:6	33:13 42:10	92:7 100:22	131:11 133:14
100:17	136:15 137:8	54:14 60:5	101:8 104:16	142:25 154:3
<b>front</b> 62:21	141:14,16	61:12,16 69:13	104:19,21	168:8
134:19 168:2	149:12 175:15	110:25 114:2	106:10 110:7	<b>guest</b> 41:20
<b>full</b> 36:12 50:11	<b>Furlows'</b> 141:8	126:3,5,5	111:5 114:20	<b>guidance</b> 34:25
115:25 116:9	<b>further</b> 2:7 31:4	127:3 137:20	114:25 115:17	35:2 38:25
<b>full-time</b> 24:3	39:4 46:25	140:13 146:22	115:21,21	57:5 81:17,23
<b>fully</b> 9:17	79:17,22,24	146:23 152:18	118:5 119:18	87:8 89:13
<b>functions</b> 18:10	80:2,3,14	<b>given</b> 44:7 45:7	120:7,9 121:4	93:10,13
18:18	87:23 92:8,13	45:19 49:4,7	122:7,7 126:5	<b>guidelines</b> 28:3
<b>Furlow</b> 1:5 4:5	93:9 173:4,18	49:11 54:13	126:15 127:4	93:4 125:16
7:17 9:7 13:4	176:7 178:15	95:2 126:13	127:14 132:1	158:11
19:4,6,12	178:18	<b>gives</b> 135:19	133:18,25	<b>guides</b> 61:19
114:22 119:10	<b>Furthering</b>	142:24 166:17	141:25 151:19	<b>guiding</b> 46:25
119:10 121:13	79:15	166:21,24	154:1 156:25	<b>gun</b> 86:20
121:15,16		167:3	159:21 161:4	120:21 173:15
122:1,3,9,19	<b>G</b>	<b>giving</b> 99:11	165:18 173:22	<b>guys</b> 115:17
123:2 124:6,11	<b>G</b> 7:11	128:13	<b>Gomez</b> 164:16	
124:18,22	<b>G-r-a-m-e-s</b>	<b>go</b> 11:1 18:19	<b>good</b> 9:2,3	<b>H</b>
125:1,25 126:7	43:18	21:12 30:14	120:13 143:21	<b>hair</b> 119:24
126:14,15	<b>gangs</b> 40:1	31:5 32:5 43:4	155:6	129:25
127:22 128:13	<b>Garrison</b> 5:12	43:7 47:9	<b>gotten</b> 95:17	<b>half</b> 24:1 33:11
128:24 129:14	<b>gather</b> 23:20	48:16 79:2	<b>GPS</b> 40:24	35:13,15 42:12
129:19 130:15	71:8 80:16	81:3 83:25	<b>grab</b> 101:7	116:3 148:2
131:14,15	149:23	88:4 91:19	<b>Grace</b> 164:19,22	<b>Hamilton</b> 2:5,7
132:6,10,20,21	<b>gathered</b> 155:6	95:8 105:1	<b>graduate</b> 21:10	5:11 8:3,4 9:1
133:18 136:6,8	<b>gathering</b> 49:22	107:13 114:7	<b>graduated</b> 22:7	9:4 13:14 20:5
139:15,16	<b>general</b> 2:18,20	131:19 134:19	115:23	20:7,10 23:20

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

37:6,11 53:6 53:10 55:9,12 55:16 59:2,4 59:11,17,24 62:3,13 65:14 65:19 67:25 75:4,8 78:18 83:22,24 95:23 95:25 101:14 104:1,25 109:23 110:11 111:18,20,22 114:14 115:6 118:20 131:20 138:15 141:24 142:2,5 143:12 146:5,18 147:4 154:9 155:20 156:2,12,20 157:2,9,17,24 158:6,9,15,22 159:1 160:4,12 160:20 161:12 162:17,24 163:5,22 164:10,25 165:16 166:10 167:11,15 168:12,18 169:5,20 170:12,19 171:2,8 172:1 172:16,20 173:5 176:7,14 176:17 <b>hand</b> 61:23 <b>handcuffing</b> 87:23 <b>handful</b> 172:22 <b>Handing</b> 101:15 <b>handle</b> 39:3 <b>handling</b> 122:15 <b>hands-on</b> 31:6 <b>hang</b> 73:17 <b>happen</b> 29:15 40:25 64:24 78:12 79:9	144:23 161:4 173:22 <b>happened</b> 50:4 75:3 80:12 119:7 120:3 122:17 128:4 134:18,25 135:10 138:8 138:12 159:25 160:1,9 <b>happens</b> 17:6 58:14,15 71:7 73:10 74:5 84:4,5 85:4 90:22 91:7,17 92:6 96:16 108:6 <b>hard</b> 37:17 143:24 <b>Harold</b> 19:22 20:13 <b>Harris-Stowe</b> 21:17 <b>head</b> 12:14 22:13 56:17 59:10 63:15 73:22 74:14 82:25 <b>hear</b> 139:9 <b>heard</b> 9:12 20:1 20:6 74:25 89:10 <b>hearing</b> 143:21 149:24 <b>hears</b> 152:14 <b>Heights</b> 43:23 <b>held</b> 7:21 97:2 139:18,19,24 165:8 <b>help</b> 24:15 31:3 31:3 79:17 80:10 166:22 <b>helped</b> 159:4 <b>helpful</b> 82:22 87:15 131:22 <b>hereto</b> 178:20 <b>Hey</b> 100:22	136:14 <b>hierarchically</b> 35:19 <b>high</b> 21:6,9,16 <b>high-powered</b> 175:2 176:2 <b>higher</b> 25:3 <b>highly</b> 155:24 <b>his/her</b> 112:3 <b>hoc</b> 32:17 <b>hold</b> 18:16 23:22 87:12 95:8 142:12 143:9 164:14 165:7 <b>Holland</b> 5:10 8:6 114:7 118:16 <b>home</b> 22:22 119:21 132:7 132:10 133:19 <b>homework</b> 44:12 <b>homicide</b> 26:18 <b>homicides</b> 33:19 <b>honest</b> 111:21 <b>hope</b> 167:13 <b>Hopefully</b> 11:5 <b>Hospital</b> 149:22 <b>hot</b> 11:5 <b>hour</b> 42:11,12 59:12 <b>hours</b> 42:9 45:9 79:11 92:3 93:8,14,18 95:19,20 118:19 135:1 139:18,19,25 147:12,20,23 147:23,24 148:2 165:9 167:5 <b>house</b> 119:24 120:6,7 141:13 156:6,11,25 162:7 166:25 171:13,17 172:6 173:24	175:6 <b>housed</b> 15:10 <b>Howard</b> 9:7 <b>Hughes</b> 2:6 6:2 8:10,10 10:7 11:14 12:25 13:8,11,17 15:8 20:1,6,9 20:11 23:17 37:6,9 53:2,7 55:6,11,14 58:23 59:3,16 62:5,14 65:11 65:17 67:21 75:2,5,6 78:13 83:19,23 95:21 95:24 101:16 103:22 109:16 111:14,19,21 115:8 118:14 118:17 131:17 138:11,14 141:21 142:1 143:12,14,16 146:6,19 147:5 148:9 154:10 155:21 156:3 156:13,21 157:4,10,20 158:2,7,12,16 158:23 159:3 160:6,14,21 161:13 162:18 163:1,7,23 164:12 165:1 165:17 166:11 167:12,17 168:14,20 169:6,21 170:4 170:13,20 171:4,10 172:2 172:18 176:8 176:15,20,24 <b>hung</b> 74:15 122:21 <b>husband</b> 117:8 119:20 150:13	150:16,17 159:17 <hr/> <b>I</b> <b>idea</b> 57:15 120:13 <b>identification</b> 62:2,12 101:13 104:24 110:10 115:5 148:8 <b>identified</b> 86:8 122:1 164:21 <b>identifier</b> 101:10 <b>identifies</b> 72:5 <b>identify</b> 71:25 <b>ignoring</b> 121:21 <b>ill</b> 166:4 <b>illegal</b> 155:18 <b>immediate</b> 28:21 82:6 111:11 112:2 <b>immediately</b> 25:18,19 30:12 35:9 74:17,20 82:21 91:14 94:9 95:12 175:19 <b>important</b> 10:18 <b>impossible</b> 10:9 <b>in-person</b> 44:8 <b>in-service</b> 47:4 50:2,2,6,9,12 50:16,20,23 51:1 68:24 98:23 <b>inactive</b> 89:4,10 89:13,18,20 <b>incident</b> 127:8 129:23 143:4,8 173:9 <b>include</b> 10:7 47:2 64:17 <b>included</b> 64:25 68:7 111:3 <b>including</b> 9:7 163:15
--	---	--	---	--

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

<b>inclusion</b> 65:24 68:6	76:19 77:11,19 78:11 80:13	<b>intelligence</b> 39:1	103:9,21 104:7	52:5 57:13
<b>inconvenient</b> 122:14	81:8 91:18 92:16 96:11	<b>intended</b> 167:18 167:21	<b>interviewing</b> 121:15	72:22 76:1
<b>independent</b> 174:17	<b>initiating</b> 112:20	<b>interaction</b> 76:1 129:11,15	<b>introduce</b> 8:2,7	105:23 125:20
<b>INDEX</b> 2:2	<b>injury</b> 128:25 129:1	<b>interactions</b> 69:19	<b>investigate</b> 22:19,21,24	125:21 147:8
<b>indicated</b> 117:18 159:4 159:19	<b>injury-wise</b> 129:25	<b>interest</b> 146:4	<b>investigated</b> 40:15 161:6	171:12 172:14
<b>indicates</b> 76:13 148:23 149:14	<b>inquire</b> 173:18 173:21 174:22 175:1,10	<b>interested</b> 22:5 63:23 72:7 96:14 97:1 127:19 178:21	<b>investigating</b> 72:24 137:4	<b>issues</b> 99:25
<b>indication</b> 109:2 128:15,25 129:16	<b>inside</b> 120:10	<b>interesting</b> 26:21	<b>investigation</b> 25:1 26:18 39:4 41:10 42:20,21 52:25	<b>issuing</b> 48:16 52:9 65:8 110:1 124:24 125:18,23
<b>individual</b> 55:3 84:6,10,17 93:6,16 95:11 123:8	<b>instance</b> 40:15 40:17 41:8,9 74:25 81:10 87:17 88:4 97:5 136:5 139:24 140:5	<b>intern</b> 23:24 24:3	<b>investigations</b> 31:3 47:1 51:21 52:2,19 52:23 53:4,15 53:19,21,23 55:18 56:9	<b>items</b> 121:6 155:5
<b>individuals</b> 119:4	<b>instances</b> 40:18 74:22 75:25 76:23 77:17 78:11,25 79:7 79:10 80:7 82:2,13 83:5 86:13,16 94:8 94:15 95:10,16 96:1,8,18 97:6 100:1 127:7 135:22	<b>interpreted</b> 52:22 54:6 109:19	<b>invocation</b> 137:8	<b>J</b>
<b>indulge</b> 63:12 110:4	<b>institute</b> 22:23	<b>interrogatories</b> 8:22 14:1	<b>invoked</b> 136:16 136:21	<b>James</b> 164:19,22
<b>indulging</b> 70:20	<b>instruction</b> 37:1 37:13 42:3,7 43:9,11,14 44:7 45:1,2,9 45:13,20,23 47:3,6,10 48:3 48:11 49:16 52:7 53:12,13	<b>interrogatory</b> 12:12	<b>involved</b> 18:21 28:17 119:4 123:21 169:3	<b>Jane</b> 65:1
<b>influence</b> 9:16	<b>instruct</b> 28:12 29:1,7,13 30:18,22 32:5 36:7,10 47:12 47:22 69:7	<b>interruption</b> 55:15	<b>involvement</b> 85:8	<b>January</b> 63:6 114:22 115:20 134:19 136:2
<b>inform</b> 91:8 103:3	<b>instructor</b> 28:12 29:1,7,13 30:18,22 32:5 36:7,10 47:12 47:22 69:7	<b>interview</b> 25:3 38:2 54:2,4,6,9 54:11,17,20 55:22,23 56:1 69:15 70:10 83:12 85:13,16 86:3,10,23 87:3,18,24 92:4,21 93:15 94:9 95:13 96:10 104:10 104:14 125:15 125:19 130:15 130:25 131:14 132:5,5 134:6 134:6,14,15 137:5,9,16,19 138:1,3 147:12	<b>invoking</b> 170:18,21 173:9	<b>job</b> 22:4,17 23:7 29:8 165:21
<b>information</b> 61:17 64:10 71:9 72:21 73:8 80:15 88:7 95:18 125:25 130:19 131:13 133:20 136:15 147:23 175:14	<b>instructs</b> 11:18	<b>interviewed</b> 51:23 52:5 96:15 97:2	<b>issued</b> 51:24	<b>John</b> 73:7 74:1
<b>informed</b> 40:19 108:15,21 122:9				<b>join</b> 24:12,16
<b>informs</b> 123:22 127:18				<b>joined</b> 8:4,6
<b>initial</b> 143:4 163:3 168:15				<b>Jon</b> 1:8 4:10 16:1,3 18:6
<b>initially</b> 150:15 152:4				<b>Jonathan</b> 5:11 8:5
<b>initiate</b> 73:7				<b>judge</b> 45:15 46:7
<b>initiated</b> 75:25				<b>judge's</b> 63:24
				<b>July</b> 33:8,13 63:10 65:1,4,7 66:9
				<b>June</b> 25:25 26:1
				<b>Junior</b> 117:15 117:16,17
				<b>jurisdiction</b> 23:7,13 38:9 144:6 155:16
				<b>jurisdictions</b> 70:2,14 95:3 144:2
				<b>justice</b> 21:20 97:18 98:20 99:2
				<b>justified</b> 71:14 83:1,4

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

jwall@paulwe... 5:15	121:8,20 126:1 126:2,21 127:10 132:19 136:15 137:18 137:19 140:8 144:16 145:13 145:17 146:2,7 146:11,17,22 148:14 150:24 152:18 153:25 158:8 161:4 164:14,20,21 166:2,13 167:2 167:4 170:21 170:22 171:5 175:12 176:13 176:19	151:12,13 <b>Lastly</b> 11:13 <b>Latimore</b> 151:12 <b>Latoya</b> 128:20 128:21 149:3 150:16 169:8 <b>Laura</b> 8:12 15:21 <b>law</b> 2:15 18:14 42:19,20 43:9 43:13,16,19 44:3,4 47:14 60:15 64:9 98:4 100:12 103:6 158:21 <b>lawful</b> 8:19 <b>laws</b> 158:19 <b>lawyer</b> 43:24 127:24 128:1 130:6 136:16 137:19 138:5 <b>lawyers</b> 122:6 <b>leading</b> 146:20 <b>learn</b> 12:23 28:15 51:14 74:2 138:2 <b>learned</b> 38:4 53:24 149:11 173:25 <b>learning</b> 20:17 25:14 28:8 <b>leave</b> 120:5,7 <b>led</b> 114:21 <b>left</b> 63:13,17 153:2 174:1 <b>left-hand</b> 118:6 <b>leg</b> 119:23 <b>legal</b> 7:24 11:23 12:1,3 43:10 45:8 50:18 123:23 127:19 <b>legs</b> 59:18 <b>leisure</b> 11:5 <b>let's</b> 20:23 21:6 30:7,7 41:13 41:23 43:7	47:9,9 49:25 58:2 59:11,12 69:10 70:18 73:25 77:17 78:7 79:6 88:4 93:20,20 94:6 101:6 110:24 114:2,4,7,18 115:19 119:12 119:12 136:3 143:6 147:18 152:12 167:24 167:24,24 168:8 176:20 <b>letterhead</b> 2:11 2:14 <b>level</b> 28:24 <b>levels</b> 75:10 <b>lieutenant</b> 35:11 <b>lieutenants</b> 78:4 <b>life</b> 122:14 153:16 <b>light</b> 41:5 48:18 48:22 99:5,6 <b>Likelihood</b> 132:8 <b>limitations</b> 59:9 <b>limits</b> 103:4 <b>line</b> 10:22 11:17 23:10 28:7 <b>Liner</b> 9:7 19:23 20:3,13 <b>lines</b> 22:8 44:23 86:7 103:12 105:20 <b>listed</b> 118:22 168:21 169:7 <b>literally</b> 72:17 172:23 <b>litigation</b> 4:17 6:10,16 7:22 7:25 15:5 <b>little</b> 10:11 26:20 33:9 34:8 41:14,15 43:9 46:19 48:19 49:6,25	60:5,7,7 61:12 69:10 70:17 73:24 82:17 101:3,4,6 102:25 107:17 111:3 115:18 125:10 128:17 137:6 142:25 143:22 154:3 157:6 161:15 161:25 <b>live</b> 22:23 81:9 155:12 <b>lived</b> 26:8 <b>living</b> 162:7 <b>LLP</b> 5:12 <b>loaded</b> 120:17 153:24 159:12 <b>local</b> 18:13 <b>location</b> 72:4 74:2 90:24 91:1,3,23 92:20 118:22 <b>lock</b> 122:7 <b>locked</b> 163:16 <b>Locust</b> 5:7 <b>log</b> 109:6 <b>long</b> 23:12,22 24:22 25:13 26:4 27:6 29:21 30:8 38:3 41:25 50:9 73:12 75:13,14 78:11 79:8 152:25 163:2 <b>longer</b> 30:17 116:10 152:6 <b>look</b> 33:14 62:25 63:13 89:14,15 102:25 116:14 118:6 128:18 134:23 136:4 137:1 <b>looking</b> 22:12 31:1 76:7 112:12 128:24
<b>K</b> <b>Kansas</b> 145:25 146:1,8 <b>keep</b> 19:19 60:6 99:12 119:17 159:12 176:20 <b>Keith</b> 43:22 <b>kept</b> 121:21 <b>Kevin</b> 1:12 4:14 7:17 8:11,18 177:2 <b>kind</b> 31:5 36:2 57:5 81:5 86:24 130:1 133:11 139:8 140:23 142:24 148:14 <b>King</b> 31:16,17 31:18 32:1,10 <b>knew</b> 124:25 <b>knocked</b> 119:22 <b>know</b> 11:7 16:3 17:22 19:3,6 19:21 20:2,13 21:21 22:9 23:17 27:18 28:15 35:4,6 36:16 41:24 44:19 45:6,11 46:19 47:12 62:24 64:24 65:21 68:16 70:16 72:3 75:12,13,17,21 76:17 77:9,16 80:6 85:7 88:15 91:20,22 91:23 92:1 96:25 98:21 100:9,11,20,23 106:11 107:25 108:3,15,17,18 109:22 114:5 117:2,23 119:3	<b>knowing</b> 38:19 84:13,16 85:6 176:4 <b>knowledge</b> 51:4 56:20 57:2 73:20 93:12 98:15 108:14 110:19 123:16 135:25 140:19 144:7 <b>known</b> 21:1	<b>L</b> <b>lacerations</b> 128:20 <b>lack</b> 58:10,10 59:8 <b>lag</b> 74:14 <b>laid</b> 76:10,12 113:16 125:13 <b>Lake</b> 149:21 <b>language</b> 64:6 64:16,20 65:15 104:5 106:4,6 106:11,20,25 109:13 111:2,3 111:6 112:12 113:23 <b>large</b> 121:6 <b>Larimore</b>		

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

143:23 148:10 171:24 <b>looks</b> 118:4,9 119:13 134:21 134:25 152:5 <b>loop</b> 60:1 93:21 <b>loose</b> 141:16 <b>lot</b> 37:17 98:22 146:11 153:22 <b>Lots</b> 57:22 <b>Louis</b> 3:1 4:18 5:7 6:3,11,17 7:22 8:13 16:18 18:6 21:10 23:5,18 24:8,17 25:3 25:18 26:1 27:3 28:2 33:17 40:1 47:5 50:8,14 60:19 65:7 66:22 69:20 70:6,13 88:17 88:22 93:10 95:1,1,4,5 98:7 98:19 99:1,24 100:12 101:5 114:17 115:13 117:5 121:5 144:4,5,11,15 144:17,20,25 145:2,22 155:15,16,19 <b>lunch</b> 42:12	72:16 80:6 82:25 89:25 123:3 124:9 140:17 154:16 158:21 161:1 168:9,11 171:19 <b>male</b> 151:3 <b>malice</b> 165:24 <b>man</b> 158:25 163:10 <b>management</b> 36:20 134:20 <b>mandates</b> 47:5 <b>mandatory</b> 143:9 <b>manipulative</b> 158:25 <b>manner</b> 10:19 30:15 39:14 41:22 <b>manuals</b> 66:3 68:25 <b>Maple</b> 118:23 119:9 149:10 150:25 <b>mark</b> 61:24 62:9 104:22 148:5 <b>marked</b> 61:22 62:1,8,11 63:5 63:9 101:12 104:20,23 110:7,9,15 115:2,4 148:7 168:1 <b>marking</b> 101:10 115:3 <b>marriage</b> 119:22 <b>Maryland</b> 43:23 <b>matches</b> 18:17 <b>material</b> 41:18 <b>materials</b> 12:7,9 36:25 37:3,8 44:23 45:4 <b>math</b> 32:20 <b>matter</b> 7:17	12:24 19:22 20:18 35:20,24 <b>matters</b> 14:24 94:21 143:17 <b>mean</b> 27:11 37:10 52:23 66:18 71:19 73:18 88:25 89:21 97:22 98:21 102:19 103:24 112:25 133:3 138:19 162:2 <b>means</b> 14:22 27:13 50:4 54:4 138:20 150:24 151:5 151:16 178:12 <b>meant</b> 20:3 49:18 55:9,9 <b>medical</b> 9:15 128:21 142:16 166:22 <b>meet</b> 13:5,7 18:5 27:16 <b>meeting</b> 13:21 16:17 28:1 55:23 72:2,7 <b>meetings</b> 98:25 <b>member</b> 121:5 <b>members</b> 49:8 52:13 <b>memo</b> 37:20,21 37:23 <b>mention</b> 168:24 170:7,8 174:8 <b>mentioned</b> 13:20 43:8 44:1 45:12 50:1 56:8 157:6 160:15 162:22 163:14 166:17 167:7 171:11 173:11 174:11 <b>Merit</b> 4:21 178:3	<b>met</b> 13:16 22:6 22:10 28:4 71:17 <b>mhughes2@st...</b> 6:6 <b>Michael</b> 6:2 8:10 <b>middle</b> 11:9 33:12 92:24 104:4 105:13 <b>Midwest</b> 4:17 6:10,16 7:22 7:25 <b>Mike</b> 55:5 111:23 176:18 <b>militate</b> 34:20 <b>mind</b> 37:7 69:1 94:13 106:4,5 114:4 119:12 129:14 134:20 153:24 173:7 <b>minute</b> 114:8 <b>minutes</b> 23:15 23:18 59:15 69:12 73:14,15 73:25 152:6,13 152:19 172:23 <b>Mirandized</b> 54:9,13 <b>Mirandizing</b> 138:4 <b>misdemeanor</b> 87:14 <b>misread</b> 111:19 <b>missed</b> 53:3 <b>Missouri</b> 1:2 4:2 4:19,23 7:20 7:22 8:14 22:2 22:7,20 43:13 70:14 103:10 157:22 161:5 178:7 <b>misstate</b> 55:1 <b>misstates</b> 131:18 <b>mistakes</b> 176:11 <b>MO</b> 4:20 5:7 6:5 6:11,16,17	178:6 <b>momentarily</b> 61:23 <b>Monday</b> 118:10 118:14 <b>monitor</b> 22:19 <b>month</b> 25:24 <b>months</b> 23:24 25:16 26:6,14 26:22 30:2 42:1,2,4 50:4 143:4 <b>morning</b> 9:2,3 93:2 115:19 <b>mouth</b> 14:25 15:1 <b>move</b> 97:16 114:18 121:8 143:1 146:25 166:25 <b>moved</b> 121:8 <b>muddled</b> 137:14 <b>MULES</b> 60:24 64:1 <b>multiple</b> 121:19 145:3,3,6 162:7 <b>Mumford</b> 31:8 31:23 32:2,10 <b>municipalities</b> 89:21 143:24 145:3,6,18
<hr/>				
<b>M</b>				<b>N</b>
<b>M-u-m-f-o-r-d</b> 31:10 <b>machine</b> 7:5 <b>magazine</b> 155:13 <b>maintained</b> 63:25 <b>maintaining</b> 27:25 <b>major</b> 21:19 <b>making</b> 33:21				<b>N</b> 5:3 7:11 <b>name</b> 7:23,23 8:3 9:4 21:2 39:18 43:17 88:7 90:13 107:15 112:7 146:3 149:1 169:8 <b>named</b> 19:21 20:17 67:9 168:17 <b>narrative</b> 66:21 67:20 68:12

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

112:8 119:13	107:4,5,11	<b>objected</b> 146:15	<b>office</b> 6:3 18:4	105:18,21
119:14 128:8	111:3 113:17	<b>objecting</b> 67:22	38:11 51:22	106:12,14,15
128:18 136:25	113:18,19,20	<b>objection</b> 11:19	52:3,8,12,14	107:5 111:8,24
<b>nature</b> 16:22	<b>nice</b> 161:10	65:17 146:5,18	53:14,25 55:20	112:5,14,21,25
18:11 19:15	<b>night</b> 25:8,9	147:4 154:9	56:10,12,16	113:7,12,24,25
33:23 34:17,23	92:24 132:16	155:20 156:2	57:9 59:6 73:3	116:5,9,10
138:22 141:4	136:13	156:12,20	90:11 99:16	117:3,11,12,19
<b>navigate</b> 61:10	<b>Nods</b> 56:17	157:2,9,17,24	125:14 139:10	128:12 136:7
<b>NCIC</b> 60:24	73:22	158:6,9,15,22	<b>officer</b> 9:2 12:17	136:11,12
64:1	<b>nominated</b>	159:1 160:4,12	12:19 14:13	137:4,5,15,25
<b>near</b> 142:19	28:25	160:20 161:12	15:23 19:3	139:15 168:4
<b>nearby</b> 150:6	<b>Noncall</b> 38:15	162:17,24	20:16 21:1,22	170:23 172:18
<b>necessarily</b>	<b>north</b> 4:17 6:11	163:5,22	22:1 24:4,11	<b>officer's</b> 67:18
27:15 31:1	6:17 23:9 40:1	164:10,25	24:11 25:7,14	67:19 92:10
32:8 33:15	116:20 117:13	165:16 166:10	27:5,7,12,24	103:19 104:9
39:3 78:22	<b>Notary</b> 4:22 7:6	167:11,15	27:24 29:4,13	<b>officers</b> 16:25
82:20 84:16	178:6	168:12,18	30:12,13,17	17:15 18:21
127:1,21	<b>notes</b> 18:1 37:12	169:5,20	31:8,12,16,17	25:4 31:21
131:11	143:23,24	170:12,19	31:22,25 32:1	34:7,10 38:24
<b>need</b> 11:6,7	146:14	171:2,8 172:1	32:2,10,10,11	54:10 57:2
22:23 52:15,24	<b>notice</b> 155:14	172:16 176:17	32:25 33:10,12	66:8 69:20
55:2 109:6	<b>notified</b> 49:1,1	<b>observation</b>	35:8 36:3,6,12	77:18 80:23
157:1	103:7 104:6	174:10	36:22 39:2,11	99:12 102:11
<b>needed</b> 22:24	149:18,25	<b>observe</b> 129:22	43:5,22,24	107:11,13
48:17,21 53:14	150:5	<b>observed</b> 120:17	45:16 46:23	108:15 138:5
68:7,11 122:3	<b>notify</b> 49:10	128:19	48:11 49:2,11	147:17
140:12 156:10	<b>number</b> 7:18	<b>observing</b>	49:12 54:10	<b>officers'</b> 96:20
<b>negative</b> 71:17	42:25 43:2	129:19	55:21 56:1	<b>Officers's</b> 27:15
71:19 132:13	72:20 91:4	<b>obstacles</b> 36:21	57:10 59:25	<b>offices</b> 4:17 18:7
<b>neighbor</b> 117:7	142:14	<b>obtain</b> 125:24	62:16 64:9	<b>official</b> 8:13
117:8 141:12	<b>numerous</b> 51:21	155:3	65:6 69:13	54:16 115:13
150:13,17	52:2,19,22	<b>occasion</b> 18:5	70:23 73:2	<b>oh</b> 8:10 30:6
152:4,6 163:3	53:4,14,15,19	47:11 48:3	74:1,2,16	116:1 118:17
<b>neighborhood</b>	53:21,23 82:24	174:23	76:21,24 78:9	143:14 151:1,8
141:18	<b>NY</b> 5:13	<b>occasions</b> 16:14	79:1 81:2,8,11	157:21 169:10
<b>Neighbors</b> 141:7		18:9 58:2,3	81:18,24 84:3	170:6
<b>neither</b> 178:15	<b>O</b>	<b>occur</b> 42:7 44:4	84:9,11,18,24	<b>okay</b> 12:13,17
<b>nervous</b> 117:10	<b>O</b> 7:11	82:3 162:9	85:2 88:5,9,11	13:5 14:12
120:5 169:15	<b>ooo--</b> 1:4 4:4	<b>occurred</b> 23:1	88:12,13,14	15:4,20 17:2
<b>never</b> 20:21	7:12 8:24	44:6 140:2	91:9,18 92:5	20:23 21:4
74:25 89:5	<b>oath</b> 10:18	<b>occurs</b> 102:17	92:13,16 93:4	23:11,16,16
108:25 140:18	<b>object</b> 11:16	<b>odd</b> 161:15,17	93:14 94:25	24:2,6,19
163:24	53:2 65:12	<b>offender</b> 23:1	95:7 96:11,15	25:17,24 26:19
<b>Nevermind</b>	67:24 78:16	<b>offenders</b> 22:20	100:5 102:4,12	27:22 30:11
83:19	83:19 95:22	<b>offense</b> 158:13	102:13,18,20	31:11,15 35:6
<b>new</b> 5:13 99:4	103:22 109:16	<b>offenses</b> 86:25	103:3,7,16	35:17 37:6,15
106:10,23,24	131:17	<b>offered</b> 54:14	104:5,13	47:9,16 53:22

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

55:12 59:3	166:7,12,17	<b>opposed</b> 83:6	173:19,20	<b>partly</b> 97:20,21
65:11,13 68:18	168:15,21	<b>oral</b> 8:22		<b>partner</b> 34:12
68:20 72:11	169:7,16 170:5	<b>order</b> 2:18,20,22	<b>P</b>	<b>parts</b> 70:14 98:6
75:6,6 79:6	171:5,11,18,20	35:5,6 48:21	<b>P</b> 5:3,3 7:11	<b>party</b> 16:21 71:2
83:22,23 88:4	172:6,18	48:21 49:3	<b>p.m</b> 177:5	<b>party's</b> 71:8
88:20,24 90:12	173:21,25	52:23 53:16,25	<b>packed</b> 59:14	<b>pass</b> 62:4 107:21
90:20 91:6	174:12,18	54:24 55:1	<b>packing</b> 121:6	108:6 121:18
92:25 94:6	175:10,22	63:25 68:17	<b>page</b> 2:3 62:23	143:13
95:16 97:14	176:24	79:25 87:9	63:1,13,14	<b>passed</b> 10:23
98:9 100:7,10	<b>old</b> 166:14	102:1,3 105:6	101:22,25	22:7 108:12,16
100:24 102:19	<b>older</b> 107:6	105:8,16,23,25	102:7 105:11	108:18,22
104:18 108:9	<b>on-scene</b> 40:23	106:21 107:14	105:13 110:24	<b>password</b>
108:21 109:1	40:24 51:18,19	107:16 108:4	115:1 128:19	107:15,19
109:11,24	72:3 78:24	109:5,7,14	134:19 136:4	<b>patrol</b> 47:17
110:3 114:2,25	84:2,4 86:11	110:13,16,20	138:16,17	117:12 123:4
116:13,18,24	117:9 119:8	142:15 155:4	168:2	144:23
118:4,21 119:3	120:4,6 126:14	166:18	<b>pages</b> 119:13	<b>patrolman</b>
119:6,17	129:12 132:23	<b>orders</b> 47:18,19	136:3	38:16
121:14 123:11	161:17,19	47:21 60:9	<b>panel</b> 25:2	<b>patterns</b> 161:23
127:2 128:16	<b>once</b> 30:12	101:4 105:16	<b>paragraph</b>	<b>Paul</b> 5:12 8:4
130:2,5 132:6	31:19 39:15	106:24 107:6,6	112:24 113:15	<b>peace</b> 19:19
134:8,17 135:7	46:12 48:24	107:12 114:17	137:2	125:5 159:21
135:13 136:1	74:10 91:6	146:3	<b>parole</b> 22:1,21	159:22
136:20 138:2,6	92:6 93:23	<b>organization</b>	23:2	<b>pedestrian</b>
138:11,14	96:9 98:10	18:13	<b>part</b> 47:6,7	33:22
139:6 141:2	105:12 106:12	<b>original</b> 3:4 92:9	51:25 65:3	<b>pedigree</b> 71:8
142:1,9 143:12	111:8,24 112:4	92:10	67:2 109:18,25	72:20 73:8
144:9,19	163:24	<b>originally</b>	145:14,18	84:18
145:16 146:9,9	<b>one-on-one</b>	121:20 124:15	<b>participate</b>	<b>pending</b> 82:9,14
147:11,22	16:12,15	<b>originated</b> 70:25	18:25 19:1	96:22
148:1,5,13,23	140:24	<b>out-of-state</b>	99:15,20,23	<b>people</b> 10:11
149:3,14,17	<b>one-week</b> 28:19	144:10	<b>participated</b>	36:20 40:4
150:9,15,20	36:17	<b>outside</b> 13:25	53:24 55:19	49:22 59:17
151:1,8,8,14	<b>ones</b> 15:16 29:25	16:9 18:6	69:7 96:10	100:20,21
151:22,25	<b>online</b> 44:10	27:14 41:8	<b>particular</b> 11:16	101:1
152:4,10,12,22	<b>oOo--</b> 4:13 7:1	59:9 66:5 96:8	35:18,25 38:25	<b>perceive</b> 17:19
152:25 153:4	7:10 177:6	96:17 99:16,21	39:23 52:25	<b>perceived</b> 17:14
153:15 154:5	<b>opening</b> 106:5	99:24 100:19	53:13 54:14	<b>performance</b>
154:13 155:14	<b>operate</b> 115:16	120:10 165:18	56:11 66:14,17	17:9,11
156:17 157:5	<b>operator</b> 49:1	<b>outstanding</b>	67:7 91:21	<b>period</b> 16:16
157:15 158:3	61:9,10 72:19	96:3,6	126:20	29:9 32:15,22
158:19 159:4	89:18 91:11	<b>overbroad</b>	<b>particulars</b>	41:2 67:7,17
159:16,19	135:15	83:21 146:16	84:16	115:23
160:9,15	<b>opinion</b> 100:6,8	<b>overcome</b> 36:21	<b>parties</b> 18:10	<b>person</b> 10:6
161:21 162:12	<b>opportunity</b>	<b>owner</b> 141:11	178:17,20	22:22 54:23
163:8,14 164:1	69:14 110:25	<b>owners</b> 49:9	<b>Partin</b> 8:12	56:11 64:11,12
165:6,11,21	126:5	<b>ownership</b>	15:24	71:23 72:5,12

## MIDWEST LITIGATION SERVICES

KEVIN WALSH 2/9/2017

74:3 84:12,21	<b>phrasing</b> 28:5	36:9 37:7	124:17	<b>pressing</b> 121:12
85:3,8,17 86:9	<b>physical</b> 25:1	71:12 121:14	<b>possible</b> 9:25	<b>presumably</b>
87:25 88:7,15	26:16 41:22	121:15 122:16	22:24 37:8	24:20 72:11
90:15,21 91:9	42:12 129:23	122:22 132:14	54:16,19 74:21	164:18
91:13 92:7	129:25 130:3	144:1	85:12,16 86:16	<b>pretty</b> 10:3
94:3,8,17 96:9	167:4 169:12	<b>points</b> 23:13	94:19	27:13 28:8
96:13 97:1	<b>physically</b> 32:8	<b>police</b> 2:24	<b>possibly</b> 10:20	30:24 31:6
100:23 102:11	<b>pick</b> 72:25	14:16 16:4	<b>Post</b> 98:8	34:4,7 61:15
103:5,20	<b>picked</b> 28:20	17:13 18:7	<b>potentially</b>	98:7 163:11
105:18,19,24	91:24 92:2	21:10,22 24:9	54:18 58:13	<b>previous</b> 67:2
106:13,15,17	103:8,21 104:7	24:13,17 25:4	61:20 72:1	87:21
111:9,13,25	121:25 122:13	25:14,20 26:2	85:14 105:19	<b>previously</b> 67:4
112:4,6,15	124:15 136:14	27:4,5,7,12,14	105:24 151:6	113:4 123:7
113:1 124:4,25	143:3	27:15,17 32:25	<b>PowerPoints</b>	<b>primarily</b> 23:8
127:3 128:21	<b>pickup</b> 104:10	33:10,12,17	45:5	<b>print</b> 178:13
129:8 130:3,10	<b>place</b> 41:5 50:7	35:8 36:3,6,12	<b>powers</b> 131:9	<b>prior</b> 63:24
140:13 142:18	58:21 71:21	36:22 39:11	134:9	64:11 67:13
142:21 161:3	119:11	41:16,19 43:5	<b>practical</b> 35:19	69:11 141:25
170:24	<b>placed</b> 58:19,24	43:23 45:20	35:24	<b>priority</b> 94:23
<b>personal</b> 28:1	70:9 72:10	46:5,13,16	<b>practice</b> 56:23	95:2,5
<b>personalities</b>	87:13 121:3	49:10,11,12,15	57:1 112:19	<b>prisoner</b> 91:2
36:21	122:11 123:9	50:8,15 63:23	123:17,20	103:9
<b>personally</b>	133:3 155:7	65:6,7 69:21	127:2,17,22	<b>probable</b> 45:17
15:17	<b>placing</b> 72:23	70:23 72:2	133:24 148:2	45:22 48:23,24
<b>persons</b> 105:19	123:12,15	84:9,11 93:10	<b>practices</b> 98:4	49:3,12,19
146:3	<b>Plaintiff</b> 1:6 4:8	96:15 97:19	98:19	51:3,18 64:10
<b>perspective</b>	<b>plaintiffs</b> 4:16	99:24 100:5	<b>preceded</b> 83:15	64:17,22,24
75:23	5:5 7:3 8:9 9:6	101:5 102:4	146:13	65:3,8 66:14
<b>phase</b> 29:16,21	20:4,12	107:5,11	<b>precinct</b> 32:11	66:17 67:5,10
29:22,23,23,24	<b>plastic</b> 121:7	114:18 115:14	32:12 34:3	69:16 70:8
30:14 32:3	<b>platoon</b> 35:14	126:12 144:5	39:1 90:25	72:9,13 74:11
<b>phases</b> 29:17,18	<b> platoons</b> 35:15	149:19 165:11	92:21 102:15	79:25 83:2
30:8,9,15,16	<b>play</b> 74:9	167:25 169:22	116:18,20	85:6,10 86:8
<b>phone</b> 41:7	<b>please</b> 8:1,16	170:22	117:13 136:13	92:11 105:17
54:20 72:6,25	9:11 11:7	<b>policies</b> 98:19	140:19 161:3	106:13 109:13
73:17 74:15	51:11 54:25	<b>policy</b> 47:14	<b>preparation</b>	109:25 111:9
92:24 121:19	65:5 68:3	86:22 101:23	13:11 170:8	111:25 113:10
121:22,25	81:20 85:23	139:20 142:12	<b>prepare</b> 13:2	122:12 125:4
122:20 123:19	96:25 99:18	142:13 165:11	<b>presence</b> 173:11	126:22 129:2,6
123:22 124:5	104:3 111:7	165:18	176:1	129:9,18 131:3
124:11,12,13	112:22 128:9	<b>polygraph</b> 25:2	<b>present</b> 8:1	131:4 134:12
124:14,18	131:21 133:12	<b>poorly</b> 67:16	126:1 134:2	162:13 169:1
125:1 127:9,18	137:13	<b>portion</b> 137:1	<b>presentations</b>	<b>probably</b> 18:19
130:7 152:3,8	<b>PO</b> 138:18	155:6	41:21	35:16 41:1
152:15 164:8	<b>point</b> 10:21 11:6	<b>position</b> 23:23	<b>presented</b>	121:8 122:13
<b>phrased</b> 67:16	21:21 24:6	27:3	105:22 132:21	124:2 133:1
124:2	25:17,19 27:2	<b>possession</b>	133:17	<b>probation</b> 16:16

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

22:1,20 23:1 24:4,11 25:6 27:17 120:20 120:22 154:2,4 154:7 157:13 <b>probationary</b> 16:25 24:11 27:5,6,12 29:3 29:9,13 30:12 30:13,16 32:15 32:22 41:2 115:23 116:4 116:10 <b>problem</b> 55:16 <b>procedure</b> 125:12 <b>procedures</b> 101:5 164:24 165:3 169:2 <b>proceed</b> 8:17 11:18 <b>process</b> 24:20,23 25:6 29:12 37:15,19 38:1 38:3 62:24 70:18 72:18 74:9 75:11,15 75:21 84:4 126:18,23 135:14 <b>processing</b> 106:16 112:6 <b>produced</b> 4:15 <b>professional</b> 20:24 40:20 41:7 <b>profusely</b> 152:21 <b>promoted</b> 38:5 <b>properly</b> 48:16 <b>properties</b> 19:18 <b>property</b> 141:11 141:12 <b>propounded</b> 8:22 <b>prosecute</b> 159:17 164:4	<b>prosecuted</b> 161:7 <b>prosecuting</b> 51:22 52:3,3,8 52:12,14 53:13 53:25 55:20 56:10,12 57:9 59:6 82:7 125:14 161:8 <b>prosecution</b> 80:10 <b>prosecutor</b> 132:4 134:3 <b>prosecutor's</b> 139:10 <b>prosecutors</b> 58:17 <b>protect</b> 167:22 <b>protection</b> 120:21 142:15 155:4 156:9,14 157:1 166:19 167:4 <b>protections</b> 27:14 <b>protective</b> 120:9 120:16 153:8 153:10,13 <b>protocol</b> 89:8 113:16 126:21 <b>proved</b> 40:24 <b>provide</b> 10:18 15:10 62:7 <b>provided</b> 43:14 129:5 135:23 <b>provider</b> 73:1,1 135:23 <b>providing</b> 84:17 <b>Public</b> 4:22 7:6 178:7 <b>publication</b> 65:23 66:1 <b>published</b> 93:10 <b>pull</b> 144:23 <b>punish</b> 166:8 <b>purchase</b> 157:13 157:16 158:5	158:11,21 <b>purchased</b> 120:21 157:7 157:12 <b>purpose</b> 55:25 56:5 57:6 69:13,22,24 83:11 86:22 87:1 125:18 142:12 <b>purposes</b> 11:20 62:6 75:19 <b>pursuant</b> 95:12 <b>pursue</b> 51:5,15 52:16,24 53:17 54:1 55:1,21 <b>pursued</b> 57:21 <b>pursuing</b> 51:10 <b>put</b> 62:15 68:20 86:9 92:15 98:8 107:14,19 113:10 169:13 173:15 174:20 <b>puts</b> 16:19 34:7 <b>putting</b> 154:19	<b>questioning</b> 10:22 11:17 63:24 64:8 111:13,16,17 140:1 169:11 <b>questions</b> 9:5,9 11:23 108:24 108:24 146:12 172:19,23 173:7 176:7,8 <b>quick</b> 124:16 <b>quickly</b> 9:25 10:3 77:10 142:11 <b>Quinby</b> 4:19 6:15 7:5,23 178:3,25 <b>quite</b> 53:3,7 150:21 <b>quizzes</b> 41:21 44:5	103:13 106:10 106:18 107:11 107:16,21 111:5,6,7 112:9 137:20 143:24 144:2 164:16 170:9 170:17 176:9 <b>reading</b> 47:17 47:19 52:1 107:14 113:15 113:23 136:25 <b>reads</b> 63:23 103:1 105:5,15 137:3 <b>ready</b> 72:15 <b>real</b> 124:16 142:21 167:8,8 <b>realize</b> 10:23 144:10 155:15 <b>realized</b> 24:12 <b>really</b> 49:21 172:23 174:7 <b>Realtime</b> 4:21 178:4,6 <b>reason</b> 9:10,15 45:24 96:23,25 105:18 108:1 124:4,20 128:3 128:12 153:16 154:16,18 166:8 <b>reasonable</b> 45:24 <b>reasons</b> 58:7 59:5 166:13 171:17 <b>recall</b> 17:25 44:22 45:7 46:10 48:3,14 48:20 50:20,23 51:1 56:13 66:5 87:7 98:9 98:16,18,23 99:4 106:20 116:24 127:16 135:1 136:7
--	--	--	--	---

**R****R** 5:3 7:11**R-o-e-d-i-g-e-r**

39:19

**radio** 33:16

72:25 73:18

90:24 168:3,10

**Ralph** 9:8 19:22

20:12

**random** 16:18**rang** 121:19**rank** 33:6 77:22

77:24

**ranking** 25:3**rape** 33:19**re-** 13:22**reach** 28:23**reached** 49:19**reaction** 19:25

20:16

**read** 12:6,9 13:3

47:13,21 63:21

64:2,4,5,13

97:23 98:6

101:20 103:2

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

<b>recant</b> 140:11 160:23 161:23 <b>recanted</b> 140:24 160:17,22 <b>recanting</b> 140:16 161:11 162:9 <b>receive</b> 38:22 46:12,15 53:12 61:5,8 70:22 70:23 80:23 81:17,23 111:12 112:3 112:14 113:1 113:24 <b>received</b> 19:8 21:8,13 34:25 37:1 40:11 41:6,16 43:11 52:7 59:6 60:3 92:17 99:5 116:21 118:9 140:10 149:15 168:3 <b>receiving</b> 44:22 136:7 <b>Recess</b> 59:21 114:11 <b>recognize</b> 101:17 115:9 <b>recognized</b> 124:13 <b>recollection</b> 44:14,25 45:18 68:5 106:23 116:14 135:6 138:7 <b>recommend</b> 176:21 <b>record</b> 7:14 10:17 11:20 59:20,23 63:18 63:22 64:9 84:19 89:1 90:5,7 114:7 114:10,13 172:25 173:1,3	176:19 177:1 <b>recorded</b> 17:22 <b>records</b> 15:7 63:25 88:18 90:2,16 120:25 134:24 <b>recounted</b> 120:2 129:24 <b>reduced</b> 178:13 <b>refer</b> 12:18 <b>reference</b> 134:9 <b>referenced</b> 130:7 <b>referred</b> 15:14 <b>referring</b> 67:6 110:6 <b>refused</b> 128:21 <b>regarding</b> 164:13 <b>regional</b> 60:15 145:11 <b>Registered</b> 4:21 178:3 <b>rejected</b> 58:5 <b>REJIS</b> 2:11,14 60:12,14,18 61:6 63:25 64:12 69:1 76:8 101:23 145:10,14,18 <b>relate</b> 61:19 <b>related</b> 15:5 99:17,25 178:16 <b>relating</b> 50:21 <b>relations</b> 100:13 100:15 <b>relationship</b> 30:21 60:17 <b>relative</b> 178:19 <b>release</b> 89:22 96:22 143:25 146:25 <b>released</b> 82:9,14 86:10 94:9 95:13 96:9 98:11 139:17	140:10,22 169:23 <b>reluctant</b> 34:9 <b>remain</b> 95:18 <b>remainder</b> 95:19 <b>remained</b> 38:11 <b>remember</b> 25:24 43:10 44:17 53:5 109:2 115:20 117:23 <b>remind</b> 41:23 <b>rendered</b> 121:3 159:15 <b>rendering</b> 120:24 <b>Renée</b> 4:19 6:15 7:5,23 178:3 178:25 <b>repeat</b> 55:13 81:20 99:18 <b>repetitive</b> 65:18 <b>rephrase</b> 9:11 51:11 59:2 65:5 68:1,3 76:15 85:23 99:18 104:2 107:2,3 123:25 133:11 <b>replaces</b> 110:15 <b>reply</b> 8:22 <b>report</b> 2:24 14:9 15:8 26:18 35:9,17 36:4 39:5,8,21 66:22 67:9,20 67:20 68:8,12 72:20 74:10,12 76:11,13 77:3 77:5 92:9,10 97:23 98:6,11 98:20 99:2,5 100:1 112:8 115:14 117:19 126:12 128:16 135:20 165:8	167:25 168:16 <b>reported</b> 39:11 <b>reporter</b> 3:5 4:20,20,21,22 6:14 7:6 8:16 10:5,17 176:11 178:1,4,4,5,5 <b>reporter's</b> 7:23 <b>reporting</b> 39:16 71:2,8 88:8 128:11 168:4 <b>reports</b> 13:3 14:2 28:3 66:1 <b>represent</b> 8:11 8:11 <b>represented</b> 11:13 <b>representing</b> 9:6 <b>reprimand</b> 40:12 <b>request</b> 11:8,10 57:10 102:11 102:20 106:15 112:6,25 <b>requested</b> 172:20 <b>requesting</b> 106:17 111:14 111:17 112:4 112:14 <b>require</b> 34:23,24 <b>required</b> 41:20 46:7 66:15,18 66:18,20 67:5 67:6,15,19 68:15 80:19 86:18 <b>requirement</b> 52:22 54:7 65:8 110:1 <b>requirements</b> 22:6,11,11 28:11,16 52:8 57:7 66:6,9 77:14 103:16 131:3 <b>reserved</b> 103:16	<b>residence</b> 14:11 19:7,9,18 71:21 120:17 121:16 123:3 140:22 141:7,9 141:12,16 150:25 171:20 171:22 <b>respond</b> 34:16 92:20 93:5 103:10 118:22 122:4,10 161:2 <b>responded</b> 34:15 117:3 119:8 123:4 140:18,22 170:22,23 <b>responders</b> 18:14 <b>responding</b> 38:23 46:24 173:9 <b>responsibilities</b> 24:3 38:13 104:12 <b>responsibility</b> 92:8 102:14 104:9 138:18 138:21 <b>responsible</b> 27:24 39:24 103:8,20 104:6 104:9 <b>responsive</b> 38:15,16 <b>restate</b> 131:22 <b>restroom</b> 11:6 <b>result</b> 126:8,9 132:12 133:1 139:3 <b>resulted</b> 66:1 <b>results</b> 71:17,19 132:13 <b>retained</b> 3:4 <b>return</b> 127:14 132:7 171:20 171:21
---	---	---	---	--

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<b>returned</b> 32:2	<b>RMR</b> 6:15	106:12 108:3	<b>secured</b> 155:5	<b>service</b> 14:4,10
<b>returning</b>	178:25	109:3,5 111:8	<b>securing</b> 123:2	19:7,9,17
127:23	<b>road</b> 38:24 39:2	112:13 118:7,9	<b>see</b> 10:4 37:7	33:18 34:10,15
<b>reverse</b> 21:5,5	151:13	134:21,24	63:2,5,14,15	141:6 148:12
<b>review</b> 13:20,25	<b>roadmap</b> 60:6	138:16,17	63:19 90:4	<b>services</b> 4:17
29:12 74:10	<b>Rob</b> 40:8	149:2 151:12	100:11,20	6:10,16 7:22
77:10 111:10	<b>robberies</b> 33:19	164:22 168:2,4	102:7,8 105:2	7:25 19:20
112:1 134:24	<b>Roediger</b> 39:17	168:22 169:11	105:5,12,13	33:18
168:23	<b>rogue</b> 165:14	<b>scenario</b> 87:20	114:6 116:8	<b>serving</b> 25:6
<b>reviewed</b> 15:8	<b>role</b> 74:8	113:6,9	128:24 134:14	77:14
15:15 170:7,15	<b>Ron</b> 43:15	<b>scenarios</b> 113:6	135:16 140:23	<b>set</b> 28:2 49:17
<b>reviewing</b> 75:22	<b>room</b> 11:5	<b>scene</b> 49:5,7,22	140:24 143:17	72:1
<b>revisit</b> 70:21	<b>Rose</b> 135:2	54:17 70:11,24	151:1 152:12	<b>sets</b> 27:17
<b>rhyme</b> 107:25	<b>roughly</b> 13:9	71:1,5,7,16	171:21	<b>Shakes</b> 12:14
<b>Rifkind</b> 5:12	19:10 23:15	72:24 102:14	<b>seek</b> 83:9,10	<b>share</b> 100:8
<b>rifle</b> 155:8 156:6	25:16 42:10	113:4 117:19	142:15,16	<b>shared</b> 69:22
156:10 157:1,7	118:19	119:4,7,15	166:22	<b>shed</b> 141:13
158:7 159:8	<b>round</b> 155:12	122:4,11 127:3	<b>seeking</b> 83:4	<b>shift</b> 116:16
173:22 175:2	<b>rounds</b> 155:13	127:10,23	130:11	118:13
176:2	<b>route</b> 151:17	128:22 146:21	<b>select</b> 40:2	<b>shingles</b> 141:14
<b>rifles</b> 157:23	<b>row</b> 132:17	150:6 151:17	<b>self-initiated</b>	<b>shoes</b> 92:15
<b>right</b> 9:13 10:14	<b>ruffled</b> 130:1	153:2 175:24	33:20,24 34:5	<b>shootings</b> 34:23
11:2,11 12:18	<b>rules</b> 10:1	<b>schedule</b> 108:2	34:9 38:20	<b>shoplifting</b> 86:6
20:4 23:10	<b>run</b> 10:3 88:7	<b>school</b> 21:6,9,16	<b>senior</b> 27:24,24	<b>shopliftings</b>
28:13 31:13	90:13	28:8,20	28:16 46:23	33:19
32:20 41:3		<b>scratching</b>	117:15	<b>short</b> 59:12 98:8
42:22 63:22	<b>S</b>	63:14	<b>seniority</b> 28:24	<b>shorthand</b> 4:20
72:13 88:14	<b>S</b> 5:3 6:4 7:11	<b>screaming</b>	77:20	7:5 178:5
96:24 111:22	<b>safe</b> 99:13,13	137:17	<b>sense</b> 23:12,14	<b>shortly</b> 118:12
116:1,5 118:10	121:3 150:7	<b>screen</b> 109:1	33:13 60:10	<b>shouted</b> 122:20
118:22 120:15	159:15 166:25	<b>scroll</b> 107:18	89:19 102:24	<b>shouting</b> 124:15
122:15 129:24	173:15	<b>se</b> 130:4	<b>sentence</b> 137:3	136:17
133:5,8,10	<b>safety</b> 174:5	<b>Search</b> 3:2	<b>separate</b> 47:7,8	<b>show</b> 40:21
136:17,22	<b>sake</b> 9:23 115:1	<b>sec</b> 175:20	94:7,21	61:21 77:5
137:8 138:25	<b>saved</b> 124:14	<b>second</b> 10:16	<b>sequence</b> 90:17	80:9 101:8
140:25 142:4	<b>saw</b> 119:15	29:23 36:11,12	<b>sergeant</b> 35:13	104:19 107:21
146:21 150:6	153:23 162:14	51:25 75:5	39:9,14,16,17	155:1
151:11 173:16	164:2,2,2	102:7 114:3	39:20 77:25	<b>showed</b> 120:25
174:2 176:9,12	<b>saying</b> 54:24	116:3 128:18	78:1 135:2,10	121:22
176:16	67:9 116:8	137:3	164:19,22	<b>showing</b> 107:16
<b>right-hand</b>	117:7 136:16	<b>seconds</b> 65:18	<b>sergeants</b> 35:10	<b>shows</b> 14:10
136:5	137:18 141:12	<b>section</b> 64:5	35:18,21,25	18:17
<b>rights</b> 99:11	156:15 157:21	102:7 104:4	36:2 39:10	<b>side</b> 54:15 62:16
137:20	164:4 168:8	105:12 110:25	<b>serve</b> 28:12 36:7	62:16 68:21
<b>ring</b> 161:14	<b>says</b> 8:22 63:2	111:2	36:9 56:4 78:1	118:6 126:3,6
<b>ripped</b> 141:14	63:18 81:11	<b>secure</b> 123:4	<b>served</b> 65:6	127:4 133:25
<b>rise</b> 114:19	97:1 104:5	151:17,19	75:18	134:1

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334



KEVIN WALSH 2/9/2017

<b>sign</b> 128:25 129:1	34:20,25 43:10 44:3 46:20	<b>specifics</b> 98:22 <b>specified</b> 54:3	<b>standard</b> 27:9 123:17,20	129:7 150:13 150:17 153:25
<b>signature</b> 7:7 46:7 176:21,22 177:3	52:14 73:17 77:9 87:16 89:12 94:23	<b>speculate</b> 109:17	127:17,22 133:24 134:12	<b>station</b> 72:2 169:22
<b>signed</b> 45:15	98:24 100:1	<b>speculation</b> 103:24 109:18	<b>standards</b> 28:1 40:20 41:7	<b>status</b> 154:4,7
<b>significant</b> 24:2 49:8	107:7 109:1,2 116:14 118:6	<b>spell</b> 31:9,13 39:18 43:17	<b>start</b> 21:6 25:18 30:13,14 93:1	<b>statute</b> 43:12 59:9 147:15
<b>signs</b> 129:23	119:6 121:6	<b>spent</b> 26:22 45:8 45:10	111:23 115:19 118:5	<b>statutes</b> 43:21 160:2
<b>simple</b> 61:15 71:4	122:16 126:18 128:13,24	<b>spoke</b> 119:18 160:16 163:10	<b>started</b> 26:1 70:19 93:2	<b>statutory</b> 44:4 <b>stayed</b> 139:8 155:5
<b>sir</b> 30:5 88:3	129:19,22,23 132:10 137:1	164:7,18,20	116:16 127:13 166:15	<b>stenographic</b> 178:12
<b>sit</b> 47:13 58:14	138:3,6 143:8 144:11,12	<b>spoken</b> 16:9,11 66:8 95:17 126:8	<b>starting</b> 20:24 23:20 33:12	<b>step</b> 71:23 72:8 84:11 87:22,22
<b>sitting</b> 73:2,3	152:18 155:18 165:14 166:12	<b>spot</b> 72:2	<b>starts</b> 137:2	<b>steps</b> 48:17,20 48:20 49:2 51:10 80:14 88:16 123:1 124:3 174:11 174:17 175:19
<b>situation</b> 150:5 153:18 174:7	<b>sought</b> 80:6	<b>spouse</b> 158:5,8 <b>St</b> 3:1 4:18 5:7 6:3,11,17 7:22 8:13 16:18 18:6 21:10 23:5,18 24:8 24:17 25:3,18 26:1 27:3 28:2 33:17 40:1 47:5 50:8,14 60:19 65:7 66:22 69:20 70:6,13 88:17 88:22 93:10 95:1,1,4,5 98:7 98:19 99:1,24 100:12 101:5 114:17 115:13 117:5 121:5 144:4,5,11,15 144:17,20,25 145:2,14,22 155:15,16,19	<b>state</b> 4:18,23 21:4,17 22:2 43:12 103:11 105:20 129:11 129:20 151:23 152:1 153:24 157:21 161:5 178:7	<b>Steve</b> 149:2 168:17
<b>six</b> 19:10 23:24 25:16 26:6,14 26:22 35:16 42:1,2,4,13	<b>sound</b> 129:14 <b>sounded</b> 143:22 <b>sounds</b> 95:10 137:6	<b>stage</b> 150:6,8 151:19	<b>state/emotions</b> 169:12	<b>stick</b> 63:14,17 <b>STIPULATED</b> 7:2
<b>smacked</b> 119:22	<b>space</b> 62:15	<b>stamped</b> 2:13,16 2:19,21,24 77:6	<b>stated</b> 121:1 160:23	<b>stolen</b> 121:1 <b>stomped</b> 119:23 <b>stop</b> 100:21 105:16,16,23 105:25 146:3 171:12
<b>small</b> 141:17	<b>Spanish</b> 149:21	<b>stand</b> 14:5 145:22	<b>statement</b> 52:6 71:9 126:10 140:11,13,17 140:25 143:23 145:17 146:22 146:23 147:2 147:11 160:24 161:1,3,7,17 162:10,19 164:23 168:11 169:1	<b>store</b> 49:9 <b>story</b> 54:15 126:3 127:4 133:25
<b>Snaps</b> 74:6	<b>speak</b> 58:16 74:19 89:5 93:23,23 95:3 113:11 121:16 125:2,19 127:9 137:9 146:21 163:9 174:23		<b>statements</b> 10:10 129:4,10 147:6	<b>straight</b> 139:25 <b>straw</b> 158:11,21 <b>street</b> 4:18 5:7 6:11,17 100:22
<b>somebody</b> 82:4 82:14,20 83:8 83:9 84:15 85:13 86:1,7 86:15,24 87:2 87:18 90:12 95:17 123:21 124:21 125:20 127:9,18 143:3	<b>speakers</b> 41:20 <b>speaking</b> 55:4 124:5,21 125:1 127:20 129:19 170:6		<b>states</b> 1:1 4:1 7:19 102:10	<b>stretch</b> 59:17 <b>strike</b> 16:10 18:20 25:18 35:20 46:11 56:7 65:24
<b>someplace</b> 151:19	<b>speaks</b> 123:18 123:22		<b>stating</b> 30:1 53:18,21 67:8	
<b>somewhat</b> 115:22	<b>specialty</b> 39:23 <b>specific</b> 43:12 48:5 56:14 107:15 109:4,6 126:24 128:17			
<b>son</b> 141:14	<b>specifically</b> 48:7 57:10 86:20 117:24 159:16 173:22			
<b>soon</b> 97:15				
<b>sorry</b> 8:11 22:15 28:4 54:17 55:11 81:4,21 116:2 118:17 118:17 123:25 125:10 128:6				
<b>sort</b> 16:24 17:20 26:13 28:25 29:7,8 32:17				

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

66:7 67:3	76:2,13,18	56:2 60:8	134:23 137:1	33:9 43:9
78:20 82:11	77:5,10,15	69:15,15 70:9	137:21 174:11	79:24 80:2
97:15 98:17	78:21 79:7	70:10 71:16	174:16 175:19	116:13 134:1
123:19 126:22	91:5 105:21,21	84:15 91:21	<b>taken</b> 4:16 7:4	136:10 153:20
163:19	111:12 112:2,7	103:5,8,11,20	48:17,21 51:20	155:8,11
<b>Strode</b> 5:6 8:8,8	134:24 135:17	104:6,10	54:8 58:9,9,11	159:16 160:19
<b>struck</b> 164:8	136:11,13	123:21 126:2	59:1,21 114:11	161:16 162:1,5
<b>subject</b> 37:23	168:23	134:15 142:16	119:11 126:12	<b>telling</b> 138:4
45:17,25 48:24	<b>supervisor's</b>	142:19,21	161:7 178:11	<b>ten</b> 57:16,23
49:14 51:17,19	67:14 68:6,7	<b>suspect's</b> 72:20	178:18	147:23
51:20 52:25	68:11 75:22	<b>suspects</b> 143:9	<b>takes</b> 26:23	<b>tend</b> 100:8
54:2,4,7,8,8,12	80:19	<b>sustained</b> 40:22	<b>talk</b> 10:12 18:6	<b>tended</b> 34:15
63:24 64:7	<b>supervisors</b>	<b>swear</b> 8:16	26:12 37:9	<b>term</b> 22:9 28:13
93:22 121:25	17:15 28:21	<b>sweep</b> 120:10,16	41:13,23 48:19	165:15
122:2,5	38:25 66:20	153:9,10,13	49:17,25 51:25	<b>Terminal</b>
<b>subjects</b> 42:17	76:7 82:8	<b>swelling</b> 128:20	58:3 60:7 79:6	101:23
48:25	<b>supplement</b>	<b>switched</b> 35:15	82:22 113:7	<b>terminology</b>
<b>subsection</b>	92:10 136:23	<b>sworn</b> 4:15 8:19	116:24 119:6	87:10
102:10 103:1	<b>supporting</b>	178:9	121:24 127:10	<b>terms</b> 15:15
106:3,7 111:2	111:11 112:2	<b>system</b> 12:5 14:3	144:3	28:24 29:18
<b>substance</b> 9:16	<b>supports</b> 18:14	15:10 60:15,16	<b>talked</b> 54:13	61:13 94:24
<b>successful</b> 27:20	<b>suppose</b> 76:9	60:19,21 61:11	68:23,23,24,25	117:14
131:15	78:6 88:1	73:21,25 77:5	86:13 101:4	<b>terribly</b> 124:2
<b>sudden</b> 147:22	<b>supposed</b>	84:17 107:13	113:4 124:18	<b>test</b> 25:1,2 108:3
<b>sued</b> 20:21	157:22	115:16 134:17	153:8 174:13	108:7,16,22,23
<b>sufficient</b> 129:9	<b>sure</b> 15:13 22:16	145:11,19,19	174:14	109:6
130:19 131:5,5	31:2 51:12	146:2	<b>talking</b> 10:8	<b>testified</b> 163:8
131:9	53:3 58:23	<b>systems</b> 60:23	30:1,2 49:22	<b>testify</b> 8:20 9:17
<b>suggest</b> 151:18	68:4 76:16	60:25 145:7	60:2,3 72:1	12:24 178:10
158:24	80:6 81:6,22	178:6	96:15 114:16	<b>testimony</b> 10:19
<b>suitable</b> 22:22	87:11 89:2,11		124:10 125:25	11:1 69:12
<b>summary</b>	89:24 95:21,23	<b>T</b>	141:21,23	70:7 131:18
148:15	96:24 98:21	<b>tactics</b> 99:12	161:21	141:25 143:18
<b>summons</b> 86:11	99:19 112:23	<b>take</b> 10:5 11:4	<b>taught</b> 51:9	143:20 145:9
147:1 169:24	120:10,13	23:12 25:13	<b>team</b> 172:22	176:13 178:8
<b>supervising</b>	123:3,24 124:1	37:12 39:2	<b>technical</b> 61:13	178:11
67:19 76:21,24	124:14 128:10	42:11 48:21	73:24 107:17	<b>tests</b> 24:25,25
78:9 79:1	132:17,18	49:2 50:7 51:9	<b>telephone</b> 71:21	41:20 44:5
80:23 81:2,8	133:13 137:12	59:12 62:25	71:23 160:16	107:22,24
81:11,18,24	139:5 140:25	73:13 75:15	161:22 163:9	108:13,19
112:21 113:7	163:11 167:24	77:17 80:15	<b>teletype</b> 76:8	<b>thank</b> 12:22
113:12,24	171:17,19	84:14,21 85:5	101:23 136:22	20:10,10,15
<b>supervisor</b>	174:17	85:9 86:18	137:10	41:12 68:18,19
36:22 48:25	<b>surveillance</b>	88:9,16 90:21	<b>teletypes</b> 130:9	87:15 101:2
66:13,16 67:1	80:8	91:2,6 108:8	<b>televised</b> 176:12	111:18,18
67:4,9 74:9,16	<b>suspect</b> 51:23	109:6 120:9	<b>tell</b> 9:11,20	112:11 114:15
74:22 75:1,18	52:4 55:22	123:1 124:3,9	21:13,13 22:3	143:14 172:18

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

173:6	<b>threshold</b> 49:17	33:2,4 39:21	50:16,21 51:2	18:15 35:22
<b>Thanks</b> 59:25	<b>Thursday</b> 4:15	159:25 160:3	60:2,6 61:18	41:16 46:15
<b>thing</b> 41:22	<b>Tim</b> 8:5	160:10	66:6 69:8	57:4 61:8
72:17 111:6	<b>time</b> 7:15 10:9	<b>today's</b> 7:14	98:23,24 99:8	70:25 80:18
146:4 160:9	10:21 13:16	13:2 15:15	<b>transcribed</b> 7:7	82:24 106:1,2
<b>things</b> 16:21	23:4 24:10	<b>told</b> 10:16 58:4	<b>transcript</b> 3:6	127:8
17:16 18:11	26:4,24 30:13	80:3 120:19	52:1	<b>types</b> 16:20,23
33:23 34:23	34:1,5,11 35:8	121:4 122:5	<b>travel</b> 151:11	18:22 63:18,22
79:21 80:9	36:3,6 38:4,4	127:24 131:12	<b>treat</b> 153:21	82:11,13 86:25
107:18 138:7	39:4 45:8	137:17,25	<b>treatment</b> 22:23	87:1 101:1
138:22 142:14	51:21 56:16	161:5	<b>tried</b> 119:23	<b>typewriting</b> 7:7
143:1 148:15	59:19,22 63:13	<b>top</b> 22:13 59:10	<b>true</b> 78:19	<b>typical</b> 33:14,15
164:1 170:14	67:7,17,17	101:21,24	161:14 165:2	<b>typically</b> 14:23
<b>think</b> 9:10 16:18	68:6 71:12	105:2,5 118:7	166:24 169:17	73:13 77:24
55:6 58:24,25	74:14 85:25	128:19 138:17	169:23	
65:15 68:20	91:24 92:1	<b>topic</b> 48:4 50:24	<b>truly</b> 154:23	<b>U</b>
70:5 75:2 77:1	102:4 114:6,9	51:2 69:2	<b>truth</b> 8:20,20,21	<b>Uh-huh</b> 31:24
77:18 78:10	114:12 116:15	70:21	178:10,11	32:9 36:23
95:14 102:20	116:19 118:16	<b>topics</b> 51:2	<b>truthful</b> 10:19	40:6 43:20
103:15 104:8	121:14 122:14	99:17	128:14 162:11	47:20 61:2
109:12 111:15	122:16,22	<b>Torres</b> 9:8 19:22	<b>truthfully</b> 9:18	94:4 102:16
111:16,16,19	123:5 124:17	20:12	<b>try</b> 71:24 72:1	109:8 116:6
111:20,21	126:2 128:1,5	<b>touch</b> 130:10	93:14,23 126:1	118:3,11
128:12 134:11	130:20,23	<b>trade</b> 28:9	133:24 140:22	120:23 121:10
145:9 146:10	132:14 143:7	<b>traffic</b> 23:21	155:1 175:19	139:2 140:14
146:14 148:13	149:15,20	33:21	<b>trying</b> 10:5 28:4	140:20 142:17
154:16,18,21	152:10 166:18	<b>trained</b> 147:17	54:25 74:13	142:23 143:2,5
166:13	166:21,25	<b>trainer</b> 28:22	121:7 133:15	147:3
<b>thinking</b> 79:12	170:17 172:24	48:13	133:21	<b>ultimately</b> 25:2
<b>third</b> 11:4 29:23	173:2 176:25	<b>trainers</b> 30:25	<b>tubs</b> 121:7,7	76:25 133:19
159:20,22	<b>timeline</b> 84:1	31:4,6,7	<b>turn</b> 62:23 63:12	133:20 136:6
<b>tholland@pau...</b>	115:22	<b>training</b> 26:13	105:11 110:24	161:8
5:14	<b>times</b> 11:16 13:7	27:21,22,23	119:12 122:8	<b>unable</b> 72:11
<b>thought</b> 20:2	19:8 34:6	28:17,20 31:21	122:19 127:24	<b>unaware</b> 17:24
42:2 133:18	42:11 119:23	36:17,19 41:14	163:16 170:2	146:8
<b>thoughts</b> 160:19	121:19 132:19	41:16 42:15,15	172:8	<b>unclear</b> 104:2
<b>threat</b> 82:21	162:9 171:6	42:18 43:8	<b>turned</b> 169:19	<b>underlying</b> 14:2
132:21	172:3,7	44:15,17 46:11	<b>two</b> 17:12 23:13	<b>underneath</b>
<b>three</b> 10:8 13:9	<b>Timothy</b> 5:10	46:12,15,17,18	34:23,24 40:6	63:18,22
29:23,24,25	<b>tinted</b> 151:4,8	46:21,22 50:2	41:1 42:11	<b>understand</b>
30:1,3 31:5,7	<b>title</b> 27:3 32:24	50:3,7,10,19	65:16,23 66:1	11:20,22,25
31:20,25 32:3	33:1,2,4	50:24 51:8,13	94:8 96:2,20	50:3 55:25
32:6 35:14	101:21 105:15	61:5,8,10	113:5 115:25	59:13 68:2
42:11 95:10	<b>titled</b> 102:8	68:23,24,25,25	116:1 118:19	95:22 112:24
96:1,4,8,17	<b>to-wit</b> 8:23	69:1 80:22	119:13 121:8	128:23 168:7
121:8 132:17	<b>today</b> 9:5,9,18	89:12 99:5	171:6 172:23	<b>understanding</b>
152:5 172:5,7	10:5 11:14,23	<b>trainings</b> 50:13	<b>type</b> 16:23 17:5	12:3 46:4

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

55:17 56:11,18	114:17 166:13	164:14 165:7	<b>want</b> 18:23	91:18 92:16
56:21 69:21	<b>vehicle</b> 47:17	166:14 170:18	26:19,21 30:24	93:5,6,15,22
79:20 80:11	121:4 123:3	171:7	52:19 53:1,21	94:19,24,25
89:17 91:14	151:24 153:3,6	<b>violent</b> 86:19	55:21 60:6,7	95:2,4,8,12
97:15 109:24	155:5,7 159:11	150:4	83:25 92:15	96:11 102:8,11
113:14 130:13	<b>verbal</b> 24:25	<b>voice</b> 161:23	96:23 101:3	102:20 103:5,7
134:10 138:7	32:7 35:2 45:2	<b>voluntarily</b>	102:6 134:14	105:15 106:1
139:16	52:10,11 99:12	170:5	136:22 142:11	106:15,17
<b>understood</b> 9:12	<b>verification</b>	<b>volunteer</b>	146:16 165:8	110:1 111:13
143:18	88:21	156:24	169:16,22	112:4,6,15,20
<b>undisclosed</b>	<b>verify</b> 71:25	<b>vs</b> 1:7 4:9	172:21 173:8	112:25 113:5,8
72:3	84:19 88:18		174:14 176:18	113:25 114:21
<b>unfaithful</b>	<b>version</b> 98:8	<b>W</b>	<b>wanted</b> 2:12,15	122:11,23,24
119:21	<b>versus</b> 7:18	<b>W-o</b> 31:12	10:24 12:5	123:9,9 124:25
<b>unfolding</b> 80:9	34:21 38:15	<b>W-o-j-c-h-i-u-h</b>	21:22 24:12	125:18,21,24
<b>unincorporated</b>	45:15 51:10	31:13	44:20,21 45:16	130:16 131:3,5
73:4	61:17 63:18	<b>Wainwright</b>	45:19 46:6	133:3,23
<b>unit</b> 40:5,7	<b>victim</b> 58:10	23:9	48:17,18,22	136:14 138:9
103:9	59:8 117:9	<b>wait</b> 95:21,21	51:10,15 52:24	143:3 144:24
<b>United</b> 1:1 4:1	119:9,18 129:8	148:2	55:8 56:1,4	146:13,17
7:19	142:14,25	<b>waiting</b> 120:14	57:6,11 62:21	147:8 161:4,22
<b>universe</b> 69:5	162:10 166:18	<b>waive</b> 176:16,21	63:18,22,23,25	162:1 171:12
97:12	166:21,25	176:22	64:7,7,10,12	172:13,14
<b>University</b>	167:3,22	<b>waived</b> 7:8	64:17,21 65:4	<b>wanted's</b> 134:17
21:18	<b>victim's</b> 169:8	177:4	65:9,16 66:2	<b>wanted's</b> 44:15
<b>unloading</b>	<b>victimless</b> 161:6	<b>walk</b> 20:23	66:21 67:10,20	44:18 45:1,10
159:15	<b>victims</b> 79:17	70:18 78:7	68:8 69:13,22	45:13 46:2
<b>unwritten</b> 57:5	<b>video</b> 80:7	114:20 115:18	70:9,19 71:13	48:4,10 50:21
<b>update</b> 68:17	<b>video-recorded</b>	<b>walked</b> 119:10	72:10,16,18	50:24 57:13
<b>updated</b> 63:2,6	1:11 4:14 7:16	<b>walking</b> 83:17	73:7,19 74:3,9	60:3,8 61:19
63:10	<b>videographer</b>	83:17 118:5	74:16,17,23	66:7,9 67:2
<b>updates</b> 50:18	6:9 7:13,24	<b>Wall</b> 5:11 8:5	75:1,11,15,19	69:2,8,10 70:3
<b>upset</b> 117:10	8:15 59:19,22	<b>Walsh</b> 1:12 4:14	75:22 76:1,3	70:5 77:19
<b>use</b> 11:6 14:23	114:9,12	7:17 8:11,18	76:19 77:10,15	78:5 89:4,10
33:20 61:1	172:24 173:2	9:2 12:17,19	78:2,9,11,23	98:14 144:3,6
67:12 70:3	176:25	14:13 19:3	79:5,8,9,21	144:20 145:7
98:14 130:10	<b>violated</b> 158:21	20:16 21:1	80:13,14,24	145:19 146:2
134:11 145:6	<b>violations</b> 22:25	59:25 61:24	81:9,13,14,15	<b>wants</b> 53:25
145:19	<b>violence</b> 87:13	62:9,17,20	83:6,10,11,12	100:5 132:4
<b>user</b> 107:15	96:2,6 97:8,9	64:15 101:11	83:15 84:1,2,6	134:1 136:16
<b>usually</b> 162:8,11	117:6 120:19	101:17 104:22	84:10,12,20	137:18,18,20
<b>utilize</b> 60:20	125:5 126:20	110:8,12 115:7	85:4,17 86:1,5	137:21 138:5
	126:24 139:22	115:9 137:4	86:9,23 87:19	155:17,17
	139:24 141:22	138:18 164:23	88:8,16,19,23	164:4
<b>V</b>	142:8,9,13	168:1,5 172:19	88:25 89:3,13	<b>warning</b> 99:12
<b>vague</b> 9:10	143:9 147:19	173:6 177:2	89:25 90:15,17	<b>warrant</b> 44:20
78:17 103:23	154:6 160:2	<b>Walsh's</b> 141:25	91:10,11,12,14	44:21 45:15
<b>various</b> 56:16				

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

46:6,7 51:6,10 51:16,24 52:5 52:9,16 53:1 53:16,17 54:1 55:2,7,8,10,21 57:7,21 58:4 58:19 63:19 64:8 79:3 81:3 81:12,19,25 82:6,10,15 83:1,3,6,9,15 86:11 94:18,24 95:5 96:5,7,22 97:3 103:12 125:8,20 130:20,22 131:2,6,15 132:2 133:1,6 133:21 137:22 138:22,24 139:1,4 141:20 142:3 146:13 147:7,8 175:15 175:20 <b>warrants</b> 45:1 45:14 46:2 57:20 58:3 59:7 60:4 61:19 69:2,8 82:24 94:2,16 96:3,21 97:7 102:8 105:15 <b>wasn't</b> 120:13 164:21 169:10 <b>watch</b> 90:23 <b>way</b> 35:22 47:25 48:10 123:6 126:15,20 130:14 146:11 166:15 169:16 <b>ways</b> 117:4,23 <b>we'll</b> 37:9 61:23 170:2 <b>we're</b> 7:24 11:9 34:4 47:12 62:9 73:23 104:21 108:3	144:16 <b>we've</b> 13:20 59:11,13 60:2 60:2 83:25 101:4 114:5,5 133:16 167:25 <b>week</b> 13:18 29:25 42:11 <b>weekly</b> 44:5 <b>weeks</b> 29:22 30:3,4,10,15 30:23 31:20,21 31:22,25 32:1 32:5 38:7 143:4 <b>weird</b> 10:12 <b>Weiss</b> 5:12 8:4 <b>went</b> 34:14 99:11 171:13 171:17,23 172:3,6 <b>West</b> 73:5,5 <b>Wharton</b> 5:12 <b>whereabouts</b> 175:1 <b>whichever</b> 92:20 <b>wife</b> 163:20 <b>windows</b> 151:4 151:8 <b>wished</b> 51:23 52:4 160:23 <b>wishes</b> 39:3 <b>wishing</b> 140:11 <b>witness</b> 7:9 8:16 13:13 40:23 75:7 109:22 118:19 138:13 142:4 143:13 157:3,18,25 158:10 159:2 160:5,13 162:25 163:6 164:11 167:16 168:13,19 170:3 171:3,9 172:17 176:23 177:4 178:8,11	<b>witnesses</b> 71:10 79:16 <b>Wojchuh</b> 31:12 32:1,11 <b>word</b> 14:25 15:1 67:13 106:16 111:15 112:5 <b>wording</b> 113:19 113:20 <b>words</b> 64:17 163:15 <b>work</b> 16:5 28:8 32:12 33:24 35:24 37:17 38:19,22 71:21 100:21 115:17 <b>work-related</b> 14:12,23 <b>workday</b> 50:11 <b>worked</b> 16:6 23:25 32:11 44:21,21 53:19 <b>working</b> 136:12 <b>worries</b> 125:11 <b>worry</b> 154:3,6,7 <b>wouldn't</b> 22:14 86:16 89:15 94:1,8 95:12 104:13 125:7 127:21 130:25 <b>wrap</b> 74:13 <b>write</b> 26:17 37:21 92:9 <b>writing</b> 144:2 <b>written</b> 24:24,25 28:3 35:2,3,4 56:19 69:25 87:5,7,8 128:19 140:13 161:3 <b>wrong</b> 20:2,6 54:25 77:2 96:25 112:13 131:2,21 145:25	<b>Y</b> <b>yeah</b> 28:6,10 37:18 55:13 85:22,24 99:15 99:15 101:24 128:10,11 133:14 136:19 137:12 138:13 144:22 <b>year</b> 16:17 23:25 24:16 25:22 27:8 33:11 35:12,15 36:11 36:12 77:20 115:25 116:9 160:1 <b>years</b> 28:24 41:1 98:22 115:25 116:1 117:14 <b>yelling</b> 137:18 137:24 138:5 <b>yesterday</b> 169:18 <b>York</b> 5:13 <b>you-all</b> 45:10 114:4 <b>young</b> 36:22	<b>101</b> 2:18 <b>104</b> 2:20 <b>11-26</b> 2:18 102:1 109:15 <b>11:59</b> 114:9 <b>110</b> 2:22 <b>115</b> 2:24 <b>11867</b> 6:15 <b>11th</b> 4:18 6:11 6:17 <b>12:09</b> 114:12 <b>12:25</b> 118:10 149:16 152:5 <b>12:26</b> 150:9 <b>12:27</b> 150:21 <b>12:28</b> 151:23 152:1 <b>12:36</b> 152:11 <b>12:38</b> 151:14 <b>1210</b> 5:7 118:23 119:9 149:10 <b>1230</b> 150:23,25 <b>1285</b> 5:12 <b>1291</b> 6:16 178:25 <b>13</b> 101:7 <b>143</b> 2:6 <b>148</b> 3:1 <b>15</b> 69:12 <b>15-26</b> 2:20 108:4 109:14 110:17 <b>1526</b> 105:6 <b>16</b> 33:8 36:14 147:23 <b>16-26</b> 2:22 110:13 <b>17</b> 30:10,15,22 31:19,21 32:4 <b>173</b> 2:7 <b>180</b> 43:3 <b>19</b> 42:24	<b>2</b> 2 2:14 62:10,11 63:9,21 64:16 65:1
			<b>Z</b> <b>Ziegler</b> 117:3,11 <b>ZIP</b> 23:9		
			<b>0</b>		
			<b>1</b>		
			<b>1</b> 2:11 61:25 62:1 63:6 64:4 64:21 <b>1/25</b> 118:14 <b>1:24</b> 172:24 <b>1:26</b> 134:22 <b>1:27</b> 173:2 <b>1:30</b> 177:5 <b>10:30</b> 116:17 <b>10:37</b> 59:19 <b>10:45</b> 59:22 <b>10019-6064</b> 5:13		
		<b>X</b>			

## MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334

KEVIN WALSH 2/9/2017

<b>2:31</b> 176:25	<b>4</b>			
<b>20</b> 23:15,18	<b>4</b> 2:20 104:22,23			
69:12 95:7	106:7 110:16			
<b>2005</b> 21:15	164:17			
<b>2010</b> 21:17	<b>4:16-cv-00254...</b>			
<b>2012</b> 24:18	1:7 4:9			
<b>2013</b> 25:23 26:1	<b>4:16CV00245...</b>			
26:23 116:3	7:18			
<b>2014</b> 63:10 65:1	<b>41</b> 6:4			
65:4,7 66:9				
116:4	<b>5</b>			
<b>2015</b> 32:21,21	<b>5</b> 2:22 110:8,9			
33:12 116:4	136:4			
<b>2016</b> 19:13	<b>50</b> 57:18,25			
33:13 63:6	108:24			
114:22 115:20				
116:8	<b>6</b>			
<b>2017</b> 1:13 4:16	<b>6</b> 2:24 115:3,4,7			
7:14 178:22	168:1,1			
<b>212)373-3373</b>	<b>60</b> 65:18			
5:13	<b>62</b> 2:11,14			
<b>23</b> 148:2,2	<b>63101</b> 6:11,17			
<b>24</b> 92:3 93:8,14	<b>63103</b> 5:7			
93:18 95:19,20	<b>63105</b> 6:5			
135:1 139:18	<b>63147</b> 23:9			
139:19,25				
147:12,20	<b>7</b>			
165:9 167:5	<b>7</b> 136:4			
<b>24-hour</b> 87:12	<b>711</b> 4:17 6:11,17			
95:8 142:12	<b>76</b> 151:16			
143:8 147:14				
164:13 165:6	<b>8</b>			
166:14	<b>8</b> 2:5			
<b>25th</b> 115:20	<b>855)724-2489</b>			
134:18	5:8			
<b>29</b> 155:13				
<b>29th</b> 136:2,3	<b>9</b>			
	<b>9</b> 1:13 4:16			
<b>3</b>	178:22			
<b>3</b> 2:18 63:1	<b>9:31</b> 1:16 7:11			
101:11,12	<b>9:32</b> 7:15			
105:8 106:5,8	<b>9th</b> 6:4 7:14			
<b>30</b> 23:19				
<b>314)615-7042</b>				
6:6				
<b>314)644-2191</b>				
6:12,18				

MIDWEST LITIGATION SERVICES

www.midwestlitigation.com

Phone: 1.800.280.3376

Fax: 314.644.1334